

In the Matter Of:

UNITED STATES vs STATE OF GEORGIA

NO. 1:16-cv-03088-ELR

JUSTIN HILL

March 06, 2023

30b6



ESQUIRE
DEPOSITION SOLUTIONS

800.211.DEPO (3376)
EsquireSolutions.com

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

1

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

STATE OF GEORGIA,

Defendants.

- - - - -

) CIVIL ACTION
) NO. 1:16-cv-03088-ELR
)
)
)
)
)
)
)
)

30(b)(6) VIDEOTAPE DEPOSITION OF

GEORGIA DEPARTMENT OF EDUCATION

Through Its Representative

JUSTIN HILL

Monday, March 6, 2023 4:03 p.m., EST

HELD AT:

GaDOE
205 Jesse Hill Jr Drive, S.E.
Atlanta, Georgia 30334

WANDA L. ROBINSON, CRR, CCR, No. B-1973
Certified Shorthand Reporter/Notary Public

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

2

APPEARANCES OF COUNSEL

Appearing on Behalf of the Plaintiff:

CLAIRE CHEVRIER, ESQUIRE
U.S. Department of Justice
Civil Rights Division
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20579
T: 202.305.6630 F: 202.305.3488
E-mail: Claire.Chevrier@usdoj.gov

Appearing on Behalf of the Defendant and the
Witness:

MELANIE JOHNSON, ESQUIRE
Robbins Alloy Belinfante Littlefield LLC
500 14th Street, N.W.
Atlanta, Georgia 30318
T: 404.856.3261
E-mail: mjohnson@robbinsfirm.com

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

3

1 ALSO PRESENT VIA ZOOM:

2 U.S. Attorney's Office:

3 KELLY GARDNER, ESQUIRE

4 SANDRA LeVERT, ESQUIRE

5 LAURA CASSIDY-TAYLOE, ESQUIRE

6 VICTORIA LILL, ESQUIRE

7 JESSICA POLANSKY, ESQUIRE

8
9 Robbins Law Firm:

10 DANIELLE HERNANDEZ, ESQUIRE

11
12
13 ALSO PRESENT:

14 STACEY SUBER-DRAKE, ESQUIRE
15 Georgia Department of Education

16 PATRICK MURPHY, Videographer
17
18
19
20
21
22
23
24
25

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

4

INDEX OF EXAMINATIONS

JUSTIN HILL, 30 (b) (6)

By Ms. Chevrier

Page 6

INDEX OF EXHIBITS

PLAINTIFF'S

NO.	DESCRIPTION	PAGE
Exhibit 970	GaDOE PBIS Strategic Plan 2014-2024 (Updated November 2018)	27
Exhibit 971	2/27/2017 Email From Justin Hill To Recipients - With Attachments GA03425967 - GA03425968	52
Exhibit 972	2/21/2017 Email Thread From Justin Hill To Garry McGiboney GA03425886 - GA03425889	69
Exhibit 973	12/5/2017 Email From Nakeba Rahming To Sandra DeMuth GA03429605 - GA03429606	99
Exhibit 974	GaDOE Office of Whole Child Supports Brochure	118
Exhibit 975	School Climate Salaries Spreadsheet	132
Exhibit 976	PBIS Training Word Document	132
Exhibit 977	GaDOE PBIS Levels of School Recognition for 2022-2023 School Year	132

INDEX OF EXHIBITS (Previously Marked)

PLAINTIFF'S

NO.	DESCRIPTION	PAGE
Exhibit 965	Notice of 30 (b) (6) Deposition	11

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

5

1 THE VIDEOGRAPHER: We are now on record.

2 Today's is Monday, March 6, 2023, and the
3 time is 4:03 p.m. Eastern Time.

4 This begins the videoconference deposition
5 of 30(b)(6) witness Justin Hill, taken in the
6 matter of the United States of America versus
7 State of Georgia, Case No. 1-16-CV 03088 ELR,
8 pending in U.S. District Court for the Northern
9 District of Georgia, Atlanta Division.

10 My name is Patrick Murphy. I'm the remote
11 videographer today, and the remote court
12 reporter is Wanda Robinson. We both represent
13 Esquire Deposition Solutions.

14 If counsel could please introduce
15 themselves and their colleagues for the record,
16 and then the court reporter will swear in the
17 witness.

18 MS. CHEVRIER: My name is Claire Chevrier
19 for the United States. I'm virtually
20 accompanied by my colleagues Laura Tayloe,
21 Kelly Gardner, Victoria Lill, Jessica Polansky,
22 Allison Ewers, and Sandra LeVert.

23 MS. JOHNSON: Melanie Johnson for State of
24 Georgia, joined virtually by my co-counsel
25 Danielle Hernandez, and I'm joined in person by

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

6

1 Stacey Suber-Drake, the corporate
2 representative for the Department of Education.

3 - - - - -

4 JUSTIN HILL, 30(b)(6),
5 being duly sworn, was examined and testified as
6 follows:

7 - - - - -

8 EXAMINATION

9 BY MS. CHEVRIER:

10 Q Good afternoon, Mr. Hill.

11 For the record, I'd like to reintroduce
12 myself. My name is Claire Chevrier. I'm a trial
13 attorney in the Educational Opportunity Section of
14 the Civil Rights Division of the United States
15 Department of Justice. I represent the United
16 States in this lawsuit and will be taking your
17 deposition today.

18 Can you please state and spell your name
19 for the record.

20 A Justin Hill, J-U-S-T-I-N, H-I-L-L.

21 Q Thank you.

22 I'm sure your attorney has explained much
23 of this to you, but we are basically just going to
24 have a conversation. I'm going to ask you questions
25 and your answer -- your job is to answer these

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

7

1 questions honestly and completely. Okay?

2 A Sure.

3 Q You were just sworn to the truth by the
4 court reporter. The oath you just took is the same
5 oath that you would take if were you testifying in a
6 court of law and puts you under the same obligation
7 to tell the truth that you would be under in court.

8 Do you understand?

9 A I do.

10 Q My questions and your answers will be
11 recorded by the court reporter. Please understand
12 that you will need to speak clearly and answer all
13 questions orally so that the court reporter can
14 capture your answers accurately. For example, she
15 won't be able to record a nod or a head shake.
16 Okay?

17 A Okay.

18 Q If at any time the computer freezes, I
19 think likely it just practiced, or there is a lag,
20 please feel free to let me know, especially if it's
21 affecting your ability to hear or answer questions.

22 A Okay.

23 Q The other thing you and I will need to do
24 is try to avoid talking over one another, which I
25 recognize may be more difficult to do because we're

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

8

1 communicating virtually. I will do my best not to
2 interrupt you when you're answering, and I will ask
3 that you do your best to let me finish when my
4 question -- let me finish my questions before
5 starting to answer. Okay?

6 A Understood.

7 Q If at any point you do not understand a
8 question, you should feel free to stop me and say
9 so. I will then try to clarify the question. Okay?

10 A Understood.

11 Q Note that your attorney may occasionally
12 object to my questions. This is to put their
13 objections and the issue on the record. It does not
14 mean that you shouldn't answer the questions.
15 Unless counsel tells you not to answer, you could go
16 ahead and do so.

17 Understand?

18 A Understand.

19 Q If you want to take a break for any
20 reason, that's fine. I just ask that if there is a
21 question pending or if you're in the middle of an
22 answer, that you finish answering before taking a
23 break.

24 Understand?

25 A Understand.

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

9

1 Q Sometimes it happens you will give an
2 answer as completely as you can and then later on,
3 maybe five minutes or an hour later, you'll remember
4 some additional information in response to that
5 earlier question. If that happens, please tell us
6 that you would like to add something to something
7 you said earlier, and you can do that.

8 A I will do so.

9 Q Thank you. How are you feeling today?

10 A Doing well.

11 Q Good. Is there any reason why you would
12 not be able to answer my questions fully and
13 truthfully today?

14 A There are no concerns.

15 Q For example, are you taking any medication
16 that would inhibit your ability to answer my
17 questions?

18 A I'm not.

19 Q Do you have any questions for me before we
20 proceed?

21 A I do not.

22 Q There are a few acronyms and definitions
23 that I'd like to go over to confirm that we have the
24 same understanding. Okay?

25 A I can do that.

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

10

1 Q When I refer to "GaDOE," do you understand
2 that I mean the Georgia Department of Education?

3 A I do.

4 Q When I refer to the "GNETS" or "GNETS
5 program," do you understand that I mean the Georgia
6 Network for Educational and Therapeutic Support?

7 A I do.

8 Q When I say "regional GNETS program," do
9 you understand that I'm referring to one of the 24
10 regional GNETS programs across the State of Georgia?

11 A I do.

12 Q When I say "the State," do you understand
13 that I mean the State of Georgia?

14 A I do.

15 Q When I say "PBIS," do you understand I
16 mean Positive Behavior Interventions and Support?

17 A I do.

18 Q When I say "ODRs," do you understand that
19 I mean office discipline referrals?

20 A I do.

21 Q When I say "SWIS," do you understand that
22 I mean Schoolwide Information System?

23 A I do.

24 Q When I say "EOY," do you understand I mean
25 end of year?

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

11

1 A I do.

2 Q When I say "LRE," do you understand I mean
3 the least restrictive environment?

4 A I do.

5 Q When I say "MTSS," do you understand that
6 I mean multitiered system of support?

7 A I do.

8 Q When I say "DBHDD," do you understand that
9 I mean Georgia's Department of Behavioral Health and
10 Developmental Disabilities?

11 A I do.

12 Q I'd like to show you what has been
13 previously marked as Plaintiff's Exhibit 965. This
14 is the deposition notice filed with the court that
15 states that the United States served a 30(b)(6)
16 deposition notice on March 1st, 2023, for testimony
17 related to the items included in Attachment A.

18 MS. CHEVRIER: Give my colleague a second
19 to pull that up.

20 (WHEREUPON, Plaintiff's Exhibit-965 was
21 previously marked for identification.)

22 BY MS. CHEVRIER:

23 Q Mr. Hill, you should have access to scroll
24 through this document.

25 A Did you need me to go to a specific page?

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
12

1 Q Sure. Can you just scroll so we can see
2 the title of this document? Perfect.

3 Have you seen this 30(b)(6) deposition
4 notice before?

5 A I did.

6 Q When did you see it?

7 A I think a couple days ago.

8 Q And who showed it to you?

9 A Stacey Suber-Drake.

10 Q Is it your understanding that you are
11 present today to provide testimony in response to
12 the topics listed on the 30(b)(6) deposition notice
13 as Attachment A, specifically questions 14, 15, 16,
14 and 17?

15 A Correct.

16 Q And you can feel free to scroll down to
17 the Attachment A if you want to double-check it is
18 indeed 14 through 17 that you're here to provide
19 testimony about today.

20 A You want me to stop there?

21 Q Sure. Just to reconfirm, it's correct
22 you're here to provide testimony on Topics 14
23 through 17, now that you have it in front of you?

24 A That's correct.

25 Q What is the basis for your knowledge of

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

13

1 these topic areas?

2 A I helped start PBIS in the State of
3 Georgia. So we launched this in 2008. I was one of
4 the first hires for this initiative. And I also
5 have been the program manager for this initiative
6 for several years, and now this program is under me
7 in my current role.

8 Q And what is your current role at the State
9 of Georgia?

10 A My current role is associate
11 superintendent for Whole Child Supports.

12 Q And what are your job responsibilities in
13 this role?

14 A To help identify barriers to students
15 being successful. Most of those would be
16 nonacademic areas, but through the MPSS State
17 Personnel grant, which is called the SP grant, which
18 has MPSS, largely an academic model. We kind of
19 take a holistic view of just what are the barriers
20 to students achieving success.

21 Q How long have you held this role?

22 A I've held this role for about a year and a
23 half. Oh, for Whole Child? No. Since October
24 15th.

25 Q That's of this -- or last year?

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

14

1 A October 15th of 2022, correct.

2 Q Who do you report to in this role?

3 A Chief of staff Matt Jones.

4 Q And who reports to you?

5 A About 40 plus staff members that represent
6 the different elements of Whole Child Supports.

7 Q And who are your --

8 A I represent --

9 Q I'm sorry. Go ahead.

10 A Go ahead.

11 So it would be representatives from school
12 nursing, social workers, school-based health
13 centers, to just name a few. School safety, and
14 then the tiered support things, which would include
15 the PBIS.

16 Q And who are your direct reports?

17 A My direct reports would be Mary Lawrence
18 Salvatore, the assistant director who handles
19 health, wellness and safety; and then Jeannie
20 Morris, who is senior program manager, and she's
21 tasked with helping to merge the MTSS framework with
22 the PBIS framework in a more holistic fashion.

23 Q And then I believe you've already started
24 to do this. Can you describe the different areas of
25 your indirect reports?

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

15

1 A School-based health. So up under Mary
2 Lawrence Salvatore, the wraparound supports,
3 school-based health centers, school social workers,
4 school nurses, school safety, mental health
5 activities, and -- I think that's the big -- that's
6 the big functions.

7 Q How does your current role relate to the
8 question topics you are here to provide testimony
9 here about today?

10 A Say that again.

11 Q How does your current role relate to the
12 question topics you are here to provide testimony
13 about today?

14 A PBIS falls underneath my purview. So many
15 of those questions fall right in there.

16 Q And so PBIS falls under the Office of
17 Whole Child Supports; is that correct?

18 A That's correct.

19 Q Did you receive any information from
20 anyone other than counsel that you will be relying
21 on to respond to questions about these topics?

22 A Just myself.

23 Q What is your highest level of education?

24 A I have an Ed.S. in leadership.

25 Q And where is the Ed.S. from?

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

16

1 A Georgia College and State University.

2 Q And what is the date that you received
3 that certification?

4 A I believe summer of 2015, I believe.

5 Q And how does your education background
6 relate to your current role?

7 A The education background in general is
8 obviously educational leadership. So change
9 initiative, how to conduct whole-scale strategic
10 scale-up of projects. I have a Master's in
11 curriculum instruction, so obviously looking at
12 education from academic and holistic ways as well.

13 I think both of them would relate to this.

14 Q How did your education background relate
15 to the question topics you're here to testify about
16 today?

17 A Um, PBIS is obviously a framework. You
18 can have it at the State level. Certainly we build
19 a strategic framework, a coaching network to make
20 that happen. Certainly education leadership speaks
21 to the scale-up of almost any initiative, really, of
22 which PBIS is one.

23 From the scale-up from the initial
24 experiments with George Sugai and Rob Horner --

25 THE COURT REPORTER: I'm sorry. You're

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

17

1 going to have to slow down. Who are these
2 people again? Say them again. From the
3 scale-up --

4 A Sure. Rob Horner, Dr. Rob Horner, from
5 the University of Oregon, and Dr. George Sugai at
6 the University of Connecticut, those two individuals
7 certainly represent the founders of PBIS from the
8 schoolwide perspective. And within their research,
9 and certainly mentioned that once they had the
10 schools that they saw some replication of good
11 outcomes, they started thinking by how do we go to
12 scale for this. And much of the going to scale
13 speaks directly to leadership activities across the
14 State, the region, to even the local level, to build
15 capacity. Certainly education leadership speaks to
16 all of that.

17 MS. JOHNSON: That was the court reporter
18 to instruct you that if you to speak too
19 quickly, she'll chime in and let you know.

20 THE WITNESS: Sure.

21 Q What is the GNETS program?

22 A What is the GNETS program?

23 Q Yes.

24 A Well, when students are not being
25 successful, certainly in the regular education

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
18

1 environment, it's my understanding GNETS is an
2 attempt to create therapeutic supports for students
3 whose IEP dictates they aren't successful within the
4 traditional school setting.

5 Q What are the goals -- sorry, go ahead.

6 A No. I think it's -- well, I think it may
7 speak to what you're asking.

8 I think the goals are to provide a
9 therapeutic approach that would hopefully lead to
10 integration back to school environment in time.

11 Q What is the target population of the GNETS
12 program?

13 MS. JOHNSON: Object to form.

14 You can answer.

15 A Can I answer?

16 Special education students, students with
17 IEPs.

18 Q When did you first become aware of the
19 GNETS program?

20 A I think when I was first hired at the DOE,
21 2006.

22 Q How did you first become aware of the
23 GNETS program?

24 A I believe I took a site visit to meet a
25 director in Forest Park, Georgia. Her name was

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

19

1 Laura Riffle, and Laura Riffle, who is a private
2 consultant today, from Kansas. She was working at
3 the GNETS, and she had -- was launching the PBIS
4 initiative, which was a grant that they called EBIS.
5 It's the same thing. And we just had a planning
6 session and I never actually walked inside the walls
7 of a GNETS until that day.

8 Q And you said she was working at the GNETS.
9 Was that for the GNETS program as a whole or one of
10 the regional GNETS programs?

11 A It was at the GNETS. It's on Ash Street
12 in Forest Park.

13 Q Thank you. Have you read any court
14 filings in connection with this lawsuit?

15 A Do I have any court filings? I do not.

16 Q Have you read any court filings in
17 connection with this lawsuit, other than the one
18 that's currently pulled up in front of us?

19 A I have not.

20 Q Am I correct you are being represented by
21 Melanie Johnson from the Robbins firm for this
22 deposition today?

23 A I am.

24 Q Did you talk with anyone to prepare for
25 this deposition today?

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
20

1 A I have not.

2 Q Did you meet with counsel to prepare for
3 this deposition?

4 A Just to go over the questions I was going
5 to be asked, if that's what you mean.

6 Q And who was present for that conversation?

7 A It was on the phone. I believe Melanie
8 might have been there and Stacey Suber-Drake, and
9 Tiffany Taylor. Nicholas, who was before me, may
10 have been there.

11 Q Is that Nicholas Handville?

12 A Handville, correct. I don't think there
13 were any other voices there that I remember.

14 Q How long did you meet?

15 A I think I was on the phone call for maybe
16 15 minutes. I had to go to another presentation.

17 Q Did you read any deposition transcripts in
18 this litigation prior to joining today?

19 A I have not.

20 Q Do you talk with anyone else outside of
21 counsel and those who were on that phone call about
22 this deposition today?

23 A I have not.

24 Q Apart from the documents shown to you by
25 counsel, did you look at any other documents to

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
21

1 prepare for today's deposition?

2 A Documents that we have on the web page
3 that's related to this, so that I can give you
4 accurate information data.

5 Q And --

6 A For example --

7 Q Sorry. Go ahead.

8 A It's okay. So, for example, the questions
9 about how many people are implementing SWIS, or how
10 many schools pertain to PBIS, things like that.

11 Q Which websites specifically did you view?

12 A PBIS webpage, if we have them, on GaDOE's
13 PBIS page.

14 Q Did you review any other documents or
15 websites?

16 A No. I just had the memos that we put
17 together that have the training numbers that we
18 collect internally, and the salary information that
19 was requested as well.

20 Q So in addition to the PBIS website and the
21 memos that you put together, that have training
22 numbers and the salary information that was
23 requested, did you review any other documents?

24 A That's it.

25 Q And what are the memos that you put

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
22

1 together that have the training numbers?

2 A A memo that has the total number of
3 schools, programs and GNETS that have been trained
4 in the various tiers of PBIS implementation. Also
5 the pullouts with GNETS. And then how many of those
6 schools in Georgia currently use SWIS.

7 Q And I would like to --

8 MS. JOHNSON: Just.

9 MS. CHEVRIER: Sorry. Go ahead.

10 MS. JOHNSON: So he has those notes with
11 him so he can give accurate numbers, and we're
12 prepared to give you access to these as well.

13 MS. CHEVRIER: Thank you. I was about to
14 request copies of those as well, in addition to
15 anything else mail he's referencing.

16 A We also have a budget, so we made sure we
17 had the salaries of all employees that help with
18 PBIS, such as a breakdown of how much everybody
19 makes and their education level.

20 In addition, on that web page you'll
21 see -- because there's a question about fidelity of
22 implementation. So all the particulars, nuances of
23 the fidelity memos that are online are also with me,
24 be made available to you as well.

25 Q Thank you.

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
23

1 Did do you anything else to prepare for
2 today's deposition?

3 A Nope.

4 Q Have you ever been deposed before?

5 A I have not. This is the first.

6 Q Have you ever been a plaintiff in a
7 lawsuit?

8 A I have not.

9 Q Have you ever been a defendant in a
10 lawsuit?

11 A No, I have not.

12 Q One moment.

13 You've already mentioned this, but in your
14 role do you have any involvement with Positive
15 Behavioral Interventions and Supports in Georgia?

16 A I do.

17 Q In what capacity?

18 A I supervise the implementation throughout
19 the State through Ms. Jeannie Morris.

20 Q And what is PBIS?

21 A PBIS is a prevention-based framework that
22 tries to kind of take a look at a learning
23 environment, and instead of sitting there reacting
24 to the environment, look at certain behaviors and
25 assume that behaviors serve a purpose and it can be

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
24

1 predicted to a degree by looking at data. And as
2 you take a prevention-based approach, and with PBIS
3 we certainly looked at the health prevention model
4 from the '60s, and with George Sugai and Rob Horner,
5 they said we can actually build an environment where
6 we can prevent, largely through adult behavior
7 change, and make the environment positive, that soon
8 we can see students hopefully being in the
9 classrooms learning, academic, certainly displaying
10 behavior, appropriate behavior.

11 Q Can you describe the basic structure of
12 PBIS at the school level?

13 A At the school level you try to put in
14 certain features, like schoolwide agreements. What
15 are the schoolwide expectations that perhaps the
16 faculty can rally around and say, let's not leave
17 certain things to chance, let's define the behaviors
18 that we wish to see, let's try to model those
19 behaviors, in context. So if we want to teach them
20 to be respectful, show them to be respectful, model
21 what respectful behavior is. And certainly try to
22 find contextual incentives, hopefully naturally
23 occurring, that we can get behavior change.

24 The majority of the students, at least 80
25 percent, Tier 1, who largely wouldn't go to the

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
25

1 office for behavior errors, so to speak, and for
2 students that don't respond to some of those
3 proactive pieces that are in place, sometimes
4 there's need for additional instruction, and we call
5 that Tier II interventions potentially.

6 And hopefully there's a school-based
7 problem solving team that's going to look at the
8 data and find out, well, how have we -- how
9 successful have we been. Have we put in all the
10 necessary features that we see 80 percent compliance
11 with these things? How are the -- who are the
12 students that aren't responding? How can we best
13 serve their needs.

14 So you try to create some Tier II things
15 that would be small group settings, that maybe
16 reinforce some of those expectations and maybe need
17 a little bit more reinforcement, some additional
18 practice with those behaviors.

19 And for the students who aren't responding
20 with that strategy, certainly there could be a need,
21 an argument made, that more intensive things might
22 be needed.

23 Q What role does PBIS play in school
24 climate?

25 A If you think about school climate, school

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
26

1 climate is certainly the perception of people that
2 are in an organization, right. I feel good about
3 where I'm at, about where I work, and it's based on
4 some common experiences that we have.

5 So A good school climate is a destination.
6 Sometimes it's nice to think that PBIS is a vehicle
7 to get there.

8 Q Is PBIS useful for students with
9 disabilities?

10 A Most certainly it is, because students
11 with disabilities are like all those students. They
12 need predictable learning environments that are
13 positive and supportive, and PBIS certainly adheres
14 to that as well. PBIS --

15 Q Sorry. Go ahead.

16 A I'm sorry. It's for all students.

17 Q Would you agree that PBIS can be useful
18 for decreasing challenging behaviors for students
19 with disabilities?

20 A Yeah, I do agree with that assessment.

21 Q I'm going to show you what we are marking
22 as Plaintiff's Exhibit 970.

23 This is the strategic plan 2014 to 2024
24 for PBIS in the State of Georgia.

25 MS. CHEVRIER: I'm going to ask my

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
27

1 colleague to share that with you.

2 (WHEREUPON, Plaintiff's Exhibit-970 was
3 marked for identification.)

4 BY MS. CHEVRIER:

5 Q Mr. Hill, you should have access to flip
6 through this document.

7 A Okay.

8 Q Can you confirm that this is indeed a PBIS
9 strategic plan for GaDOE from 2014 to 2024?

10 A Correct. It's under revision but that is
11 what we published.

12 Q And do you recognize this document?

13 A I do.

14 Q Let's turn to Page 4, or I'm going to ask
15 you to turn to Page 4.

16 Do you see where it says under the heading
17 Introduction, quote: "In 2007, the Georgia
18 Department of Education (GaDOE) Division for Special
19 Education Services, established the Positive
20 Behavior Support Unit to provide professional
21 learning and technical assistance in tiered
22 behavioral supports to address the high rates of
23 exclusionary disciplinary practices used in Georgia
24 K-12 schools, including the disproportionate rates
25 of suspension of students with disabilities"?

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
28

1 A I do.

2 Q Is it fair to say that GaDOE's focus on
3 PBIS began around 2007?

4 A It did officially from the schoolwide
5 perspective when we had a relationship with the
6 National Technical Assistance Center. But I was
7 hired in 2006. In many ways our first initial task
8 was to take Functional Behavior Assessment skills
9 and teach student support teams who were already
10 kind of at that tiered three level and try to teach
11 those skills to school teams. And we decided to
12 actually launch a more comprehensive approach at it
13 when we started partnering with George Sugai and the
14 National Technical Assistance Center for PBIS, and
15 then we started launching a more strategic approach
16 instead of just scattered trainings with -- and give
17 skills to just random school teams, to have a more
18 comprehensive way to approach the problems.

19 Q So is it more accurate to say that GaDOE's
20 focus on PBIS began around 2006 and became focused
21 on schoolwide supports in 2007?

22 A I think so. I mean you could say that the
23 PBIS philosophy was certainly invested in in 2006,
24 but from, as you've spoken, to a more comprehensive
25 way, so 2007 to 2008 is very accurate.

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
29

1 Q Do you see on the same page where it says,
2 quote: "The PBIS unit quickly discovered that in
3 many cases, schools did not have a continuum of
4 behavioral interventions nor did they have
5 established processes of data review or analysis in
6 place to prevent or address problems before they
7 reached a level resulting in exclusionary practices
8 like suspension"?

9 A That's correct.

10 Q And do you see where it says, quote: "The
11 Georgia Department of Education decided to implement
12 the Positive Behavioral Interventions and Support
13 (PBIS) framework to improve school climate in
14 Georgia's K-12 schools"?

15 A That's right.

16 Q You've already touched upon this, but in
17 what ways did GaDOE implement the PBIS framework to
18 improve school climate?

19 A The No. 1 way is that we actually
20 partnered with the National Technical Assistance
21 Center to say how can Georgia do this comprehensibly
22 and do it right, and to make sure that we're
23 attached with national coaches, national technical
24 assistants.

25 So we do this very comprehensively, and

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
30

1 Dr. Heather George, who was the co-director at the
2 Florida project, became our national TA, and the
3 National Technical Assistant Center, you can
4 imagine, the research cadre, looking down across all
5 the states and trying to learn the lessons of
6 implementation science, where is it going well,
7 please inform the national research.

8 So in many ways she was helping us look at
9 what are the States doing during their journey, so
10 we could have a more successful implementation as we
11 move forward. And we still maintain that
12 relationship with Dr. Heather George even today.

13 Q In what ways did GaDOE implement the PBIS
14 framework to improve school climate?

15 A Similarly we had a DOE team initially,
16 just the DOE team, and our job was to go and teach
17 -- to introduce the concept to a district
18 superintendent, certainly in the rural areas if it
19 was valid, because the metro would be some of the
20 cabinet members. And try to speak to the components
21 necessary to achieve this success long-term.

22 Many times, at the early stages, it was
23 looked at as an experiment from some district's
24 point of view. Well, I'm not sure what this is. So
25 we take small cohorts for the first couple of years.

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

31

1 But as years progressed, and we certainly leaned on
2 the national researchers, we learned the best way to
3 do this is not to have scattered school trainings
4 but to certainly invest in certain agreements with
5 districts and say a district needs to have a team
6 dedicated to looking at their climate data, which
7 would include, of course, discipline data and some
8 of their own practices, look at their student codes
9 of conduct.

10 And we started making -- as the years went
11 on, we say we need to make sure there's a dedicated
12 staff member at the district to provide that
13 coaching support ongoing so that the State of
14 Georgia, and it was limited to a team at that time,
15 maybe four members. We can't train the entire state
16 and coach the entire state if we're going to go to
17 scale.

18 So having district coordinators in place
19 that we could build some behavior expertise was a
20 way we could start building some additional
21 capacity, start expanding our approach. Because we
22 only have four people trying to install something as
23 comprehensive as PBIS, it would take a really long
24 time, and in time we were able to convince lawmakers
25 to invest with .5 SDE, start putting school climate

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
32

1 specialists in many of the Regional Educational
2 Service Agencies, which Georgia has 16, and that
3 became some seed money to take a state, region, and
4 then district capacity building campaign, so to
5 speak.

6 Q What is the official status of the PBIS
7 framework within GaDOE today?

8 MS. JOHNSON: Object form.

9 You can answer.

10 A The team right now has been moved over to
11 -- from teaching and learning over with me in Whole
12 Child. And my task is to take the behavior side of
13 MTSS and the academic side of MTSS and to merge the
14 frameworks into a more holistic way to deliver
15 supports to students.

16 Georgia is not the only state attempting
17 this. Washington State being one of them. Michigan
18 has been successful doing this, Wisconsin and
19 Florida.

20 What we don't want to see happen is
21 schools start forming so many teams to do
22 comprehensive problem solving that we're not being
23 very efficient. So the solution is not always for a
24 school team or for a high school, for example, to
25 have 30 teams dedicated to similar things. We want

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
33

1 to make sure that we're having teams to be more
2 effective and efficient and asking some of the same
3 preventative questions, because ultimately it's
4 about students being successful and what are the
5 various things that make students successful.

6 That's the current status. We're still
7 training schools in comprehensive PBIS, but we're
8 certainly starting to form plans and partnerships on
9 how this merging would go look like on the ground
10 level.

11 Q Does GaDOE currently require Georgia
12 schools to use the PBIS framework?

13 A It's entirely voluntary. Research
14 indicates that forced implementation of PBIS
15 certainly yields very poor fruits. Louisiana being
16 one example. Alabama trying to do so temporarily,
17 also proving to be a very bad example.

18 Q Does GaDOE require regional GNETS programs
19 to use the PBIS framework?

20 A I think there was a time that we did. I'm
21 unaware if we still maintain that. I know SWIS
22 participation, if we're looking at their data, is
23 certainly voluntary.

24 Q Does GaDOE encourage Georgia schools to
25 use the PBIS framework?

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

34

1 A We do.

2 Q And what about regional GNETS programs
3 presently now that it's optional for them?

4 A I don't supervise the GNETS, so I can't
5 speak to the supervisor in special education that
6 provides that. But I do know that the GNETS
7 directors or their designees are certainly invited
8 to attend all of our regional meetings, whether they
9 are in person or online, and I do know that several
10 of them still implement it.

11 Q Does GaDOE currently support Georgia
12 schools with their adoption of the PBIS framework?

13 A They do.

14 Q In what ways?

15 A They do so with -- the team that has been
16 assembled at the State, that falls under me, the
17 large cadre of professionals that certainly deliver
18 training to schools, training to school climate
19 specialists to build regional capacity, in concert
20 with them, certainly train brand-new district
21 coordinators of the PBIS framework to make sure that
22 they can sustain implementation, which training
23 takes place, because implementing a framework is not
24 a pray-and-spray approach. It's not just hiring a
25 professional trainer to train the school in a couple

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
35

1 of days and pretend that large-scale change is going
2 to take place. It's going to take a couple of years
3 for schools to change their practices.

4 So this coaching infrastructure from the
5 State, the region, and the district level certainly
6 helps take that on.

7 Q Are there any regulations in Georgia
8 applicable to PBIS?

9 MS. JOHNSON: Object to form.

10 You can answer.

11 A If you could repeat that, please.

12 Q Sure. Are there any regulations in
13 Georgia that are applicable to PBIS?

14 MS. JOHNSON: Same objection.

15 You can answer.

16 A I'm not aware.

17 Q How many counties or school districts in
18 Georgia have implemented PBIS?

19 A About 60 percent. You know, we have
20 districts that sign the agreements and have to do
21 recommitments. Right now we're at -- at the end of
22 2000 and 22 -- '21, '22, we had 1,400, down to 419
23 schools and programs implementing. We think by the
24 end of this year we're going to be at 1,500.

25 It would be approximately 60. If you want

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
36

1 the exact number of districts, I can retrieve that
2 for you. I don't have it with me today.

3 Q Thank you.

4 If a school district agrees to participate
5 in the PBIS framework, does that mean each of the
6 schools within the district will utilize the PBIS
7 framework?

8 A Not necessarily, because some districts
9 can be as large as Gwinnett, our state largest, and
10 we usually say that no matter how many schools
11 participate and give numbers voluntarily, we don't
12 mandate that every single school. We certainly
13 offer encouragement them to consider implementing in
14 all the schools. But all we ask is that there's a
15 district team that's informed to help sustain the
16 limitation of where the training and coaching has
17 taken place, and that will just build sustainability
18 over time. Otherwise we just fall into the rut of a
19 pray-and-spray approach to change.

20 Q Is it correct you just said that about
21 1,400 schools in Georgia have implemented PBIS and
22 that you're hoping it will approach 1,500 by the end
23 of the school year?

24 A We think that's correct. 1,500. The
25 1,419 is -- that's the number.

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
37

1 It's important to realize schools, plus
2 programs, because GNETS is not a school, it's a
3 program. So we can put that together.

4 Q How many schools have implemented Tier I
5 of the PBIS framework?

6 A That would be 1,419 and approaching 1,500.

7 Q And how many schools have implemented Tier
8 II of the PBIS framework?

9 A Just north of 400. About 403 as of end of
10 '21-22 school year, and we'll be calculating those
11 numbers for this school year here in a couple of
12 months.

13 Q How many schools have implemented Tier III
14 of the PBIS framework?

15 A Tier III is typically not provided by us.
16 We certainly concluded developing our Tier III, our
17 advanced tiers training curriculum, but for some of
18 the Tier III trainings that the GNETS might
19 participate in, I think that's been used -- been
20 facilitated by the Georgia State University, Dr.
21 Daniel Crimmins.

22 Q Do you have information about how many
23 schools currently implement a Tier III framework for
24 PBIS?

25 A I do not.

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
38

1 Q Do you have --

2 A The --

3 Q Go ahead.

4 A Tier III has been delivered through Daniel
5 Crimmins and his staff at Georgia State University,
6 and I don't have his training records. But in the
7 interim we have just completed our draft, our
8 training curriculum, so we can began to deliver that
9 in concert.

10 Q I understand a school might not need to
11 provide Tier III services based on the students that
12 happen to be enrolled in the school at that time; is
13 that correct?

14 A Say that again.

15 Q Students are put into different tiers
16 based on their needs; is that correct?

17 A Well, I think it would be inaccurate to
18 say a student is placed in tiers. I think getting
19 tiered support services. You know, it's a technical
20 difference. But they get Tier III supports, because
21 a student could need Tier III supports in reading
22 but maybe not need Tier III supports in mathematics.
23 So they could be receiving, you know, full
24 Tier I kind of instruction environments that just
25 need temporary support in this environment.

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
39

1 Does that help?

2 Q Yes. Thank you.

3 It's possible that a school one year might
4 not need to provide Tier III services for behavior
5 but might in a different year require -- need to
6 provide Tier III services based on its student
7 population; is that correct?

8 A I don't think I understand because I don't
9 think that's correct. If you can say that again.

10 Q Sure. What, what would require a student
11 to receive Tier III services for behavior?

12 A You're going to need Tier III support.
13 Usually it's going to get into the area of
14 potentially an SST team essentially, and then you're
15 going to move and progress to an IEP consideration,
16 which is most intensive behavior supports. But that
17 would be a determination by the IEP team.

18 Q So is it possible that a particular school
19 one year would not have any students requiring Tier
20 III supports but another year might have a student
21 requiring Tier III supports?

22 A If the students don't have an IEP -- hard
23 to imagine any school that did have anybody that
24 didn't have an IEP, but it's, it's possible. I
25 never heard of a school that didn't have a single

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

40

1 student who had an IEP Tier III support. But it's
2 possible.

3 Q So you testified earlier that you don't
4 have the number of schools implementing Tier III of
5 the PBIS framework, correct?

6 A I don't know how many schools have been
7 trained in Tier III systems, which gets into FBA,
8 Functional Behavior Assessment, Behavior
9 Intervention Planning. Again, that would be
10 maintained -- possibly the Special Education
11 Division may have that through their relationship
12 with Georgia State University.

13 Q I was asking you questions because I'm
14 trying to get at, you know, to what extent do
15 schools have the capacity to provide Tier III
16 supports even if they don't currently need to
17 provide Tier III supports. Do you have any
18 information about a school's capacity to provide
19 Tier III supports currently in Georgia?

20 MS. JOHNSON: Object to form.

21 You can answer.

22 A Now, we usually have a fidelity instrument
23 called a tiered fidelity inventory, or the TFI.
24 Within the TFI, certainly there are validated
25 research questions that can help a school assess its

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

41

1 ability to analyze its Tier III support system. If
2 that makes sense.

3 Q Yes.

4 A So the fidelity inventory, that the
5 University of Oregon certainly played a major role
6 in helping to create, that we use in the State of
7 Georgia to help assess fidelity.

8 At Tier I and at Tier II, and even at Tier
9 III, a school team can ask itself certain questions
10 about its capacity to analyze and provide supports.
11 And when it's determined that they need additional
12 supports to build that Tier III system, certainly a
13 lot -- many times they reach out to the Georgia
14 State project where they have additional capacity,
15 while we're completing some of our -- improving our
16 capacity to do the same.

17 Q Is it correct that GaDOE does not track
18 how many schools in Georgia are able to provide Tier
19 III supports because that is being done through the
20 University?

21 MS. JOHNSON: Object to form.

22 You can answer.

23 A If you could repeat that one more time.

24 Q Sure. Is it correct that this -- that
25 GaDOE does not track how many schools provide Tier

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
42

1 III supports because the training for that is
2 currently being done through the University?

3 A Possibly. Again, I don't know what
4 Special Education Division is tracking.

5 Q But the Office of Whole Child Supports,
6 which the PBIS office is currently under, does not
7 track how many schools offer Tier III supports,
8 correct?

9 A I think we're probably not talking the
10 same. So when we say Tier III supports, you know,
11 again, what we're doing is helping a school assess
12 its system, its ability to provide Tier III, its
13 ability to analyze its own data and its own system
14 of supports, and we provide coaching around that.
15 But if you're looking at the number of schools that
16 are taking the TFI and are looking and analyze it to
17 Tier III, we can do that.

18 How many schools are taking the TFI and
19 looking at the Tier III section of the TFI to
20 determine that, I would say the answer is yes to
21 that.

22 Q Does GaDOE track how many schools have
23 been trained by the University to offer Tier III
24 supports?

25 A I don't know.

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
43

1 Q And is it correct that as of now schools
2 would not have received training other than from the
3 University? For Tier III?

4 MS. JOHNSON: Object to form.

5 I'm sorry, I didn't mean to interrupt.

6 A It could have. GNETS could seek
7 additional training that maybe I wouldn't know
8 about.

9 Q Is there an expectation that eventually
10 all Georgia schools will provide Tier III services?

11 A There's the expectation that all Georgia
12 schools would desire to analyze their Tier III
13 systems or ability to provide more comprehensive
14 supports. It's really a continuous improvement
15 process of looking at their system.

16 Q In your opinion, are there occasions when
17 a student would appropriately receive Tier III
18 services even if they do not have an IEP?

19 A Well, there's, there's a -- between Tier
20 II and Tier III certainly there's a court mandated
21 student support team that would look at where
22 individualized students are in their individualized
23 plans and make recommendations potentially that
24 could lead to a student receiving an IEP or
25 receiving testing that could conclude a student

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
44

1 getting an IEP.

2 Q What do you mean by a court mandated team?

3 A The State of Georgia, and I believe also
4 the State of Alabama, have a federal requirement to
5 have a student support team in place, and I believe
6 this court case goes back well over 30 years ago, I
7 believe.

8 Like each school is mandated to have a
9 student support team.

10 Q And can you describe the student support
11 team?

12 A The student support team is a group of
13 educators who would look at students more
14 individually, looking at certain data sets, like
15 formula assessment data, teacher recommendations,
16 students' grades.

17 It's really looking at students who are
18 not being successful in math, so they're not being
19 successful in reading, maybe even behavior, and
20 certain team -- you know, a team of those, those
21 teachers would create SST folders, an SST charity
22 school, to kind of look at are there common sense
23 interventions that are being made for the individual
24 students, are they yielding any changes? Are
25 students being successful?

1 Now, there's an assumption -- the
2 assumptions are that the students are largely coming
3 from a Tier I environment where solid education,
4 solid instruction is taking place. You have the
5 assumption that they already receive some type of
6 evidence-based Tier II interventions, and while
7 that's not yielding success, a student support team
8 should be looking at those individual students, who
9 should be few in number, and collecting some data
10 and asking themselves, you know, how can we best
11 support these students. And if the students aren't
12 being successful, certainly there would be an
13 argument to be made, maybe we should consider some
14 additional testing, maybe the student has a learning
15 disability, and maybe -- and it may lead to a
16 student receiving an IEP.

17 Q When do student support teams need to
18 convene for a student?

19 A Well, usually student support teams
20 should, should convene or should start collecting
21 data when students are starting to not be
22 successful, failing grades, failing main academic
23 areas, demonstrating behaviors. That again we would
24 like to see most students, if not all students, stay
25 in a classroom and behaving, and certainly

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
46

1 demonstrating behaviors that will lead to success,
2 but sometimes they are not.

3 And when we start to see students with
4 multiple referrals to the office, or ODRs, as we
5 mentioned at the beginning, the student support team
6 would say, you know, maybe there is something else
7 that the student needs, what haven't we tried before
8 to help the student be successful.

9 Q And who identified that a team needs to
10 convene?

11 A Well, it could be an individual teacher
12 could make a recommendation to an SST team. I
13 certainly was a teacher in Georgia for seven years,
14 and I've certainly made recommendations for my own
15 students to go to a student support team because
16 they've been in place for a long time.

17 And you say, why would you make the
18 recommendation, and districts have formalized the
19 process over the years, and sometimes those student
20 support team folders, which would have a student's
21 pieces of data, that were certainly held in private
22 settings, a lot of times we pass -- and if you're at
23 the middle school, lot of times you take those
24 folders and they follow the student to the high
25 school. So that the high school and ninth grade

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
47

1 cadre of teachers can look and say what has the
2 middle school done that maybe we could consider
3 doing.

4 And, again, at a reasonable amount of time
5 students still aren't showing success, you know,
6 after some of the interventions that are taking
7 place, then the strong argument will be made to do
8 an IEP to a special education coordinator at the
9 school, maybe we need to consider some other things.

10 Q Do SST teams work with GNET students?

11 MS. JOHNSON: Object to form.

12 You can answer.

13 A They might. But I don't think an SST team
14 exists at GNETS. I think an SST team might identify
15 and have GNETS -- might have students that
16 eventually make it to GNETS.

17 Q For each team --

18 A But I'm not aware --

19 Q I'm sorry. Go ahead.

20 A I'm just not aware that the SST team
21 exists at GNETS, where they're already in kind of a
22 Tier III environment.

23 Q For each student in GNETS, should Student
24 Support Team have already convened prior to that
25 GNETS placement?

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
48

1 MS. JOHNSON: Object to form.

2 You can answer.

3 A I don't, I don't -- I'm not sure because
4 they already have an IEP. So once the student has
5 an IEP, they're not going to have an SST team
6 anymore.

7 Q So SST or student support teams, are
8 always in place prior to a child receiving an IEP?

9 A Correct.

10 Q And then the SST does not continue to meet
11 once a child has an IEP?

12 A That's correct.

13 Q If a student needs Tier III services or
14 supports, who provides those supports?

15 A That would be the Special Education
16 Department typically.

17 That's in the realm of behavior through
18 Functional Behavior Assessment, intervention plan
19 for students.

20 Q How many schools have received Tier III
21 PBIS training by GaDOE?

22 MS. JOHNSON: Object to form.

23 You can answer.

24 A I don't think -- that I don't know. I
25 don't think there's any, but there could have been

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
49

1 some that have been given a Tier III coaching
2 guidance, but I can't see on the special education
3 side.

4 Q Has the PBIS --

5 A Again --

6 Q Sorry. Go ahead.

7 A Okay. Again, we're just finished our Tier
8 III training curriculum probably two months ago, so
9 that we can build additional capacity. So we've not
10 had specific, at least from our team, Tier III
11 supports, trainings.

12 Q So currently it is accurate to say that
13 zero schools in Georgia have received any formal
14 Tier III PBIS training by GaDOE?

15 A Again, I can't speak to what special
16 education may have done, but I'm not aware of.

17 Q Is it accurate to say that zero schools in
18 Georgia have received Tier III PBIS training by the
19 PBIS team in the Office of Whole Child Supports?

20 A That's accurate.

21 Q Are there students with disabilities who
22 receive Tier III services?

23 A There are.

24 Q So Tier III services should be available
25 for students who are not designated as a special

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
50

1 education student?

2 MS. JOHNSON: Object to form.

3 You can answer.

4 A Again, that's a different way of looking
5 at it. If you have an IEP, you're special
6 education, you're receiving those specific
7 Individualized Education Plans.

8 When it comes to what we might provide, it
9 would be how a school can look at its Tier III
10 system of support, how successful is it being.

11 Q So just --

12 A It may sound --

13 Q Sorry. Go ahead.

14 A It may sound nuanced but it's not. Those
15 are two separate things.

16 Q So is it fair to say that some students
17 without disabilities receive Tier III services?

18 A They do not that I'm aware of. Tier III
19 services through an IEP is for special education
20 students.

21 Q So in your opinion --

22 A Students --

23 Q Sorry. Go ahead.

24 A Students with an IEP would not be
25 receiving -- they would not be receiving that unless

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

51

1 there was more individualized from an SST team, but
2 it's going to be very low level, not high intense
3 interventions.

4 Q In your opinion, should Tier III PBIS
5 supports only be available to students with special
6 education needs?

7 MS. JOHNSON: Object to form.

8 You can answer in your personal capacity.

9 A Again, what we have the capacity to do is
10 help a school analyze its ability to and how it's
11 providing those supports, not giving them
12 specifically to students. Our ability -- our job,
13 and one of our missions, is to help a school and a
14 district assess its system and assess its ability to
15 build capacity to provide effective support. How
16 well are you doing? How do you know that you're
17 doing well? How did you determine that? Because
18 we're not providing that specifically.

19 Q Do you know how many schools in Georgia
20 have assessed its system to determine whether
21 they're capable of providing Tier III supports?

22 A I don't have -- how many -- say it one
23 more time. I think the answer is the TFI, which is
24 the Tiered Fidelity Inventory.

25 Q Sure. Let me --

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
52

1 A If you could just -- sure. Thank you.

2 Q How many schools in Georgia have assessed
3 their system to determine whether or not they have
4 the capacity to provide Tier III PBIS supports?

5 A I don't have that number with me, but I
6 certainly could retrieve that. Again, it would be
7 our looking through what's called PBIS apps, a
8 program that we partner with the University of
9 Oregon, and we say how many schools have actually
10 asked themselves and taken the Tier III section of
11 the TFI, or the Tiered Fidelity Inventory, for
12 behavior.

13 But I could get that.

14 Q I'd like to show you what will be marked
15 as Plaintiff's Exhibit 971.

16 This is an email from -- and it's Bates
17 No. GAA03425967.

18 (Whereupon, Plaintiff's Exhibit-971 was
19 marked for identification.)

20 BY MS. CHEVRIER:

21 Q This is an email from you, Mr. Hill, dated
22 February 22nd, 2017, to a number of people.
23 Correct?

24 A Appears to be so.

25 Q The subject is "Justin: Draft Tiered

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
53

1 Timeline," correct?

2 A Yes.

3 Q It includes an attachment titled, "Draft
4 PBIS Tiered Timeline," correct?

5 A It does.

6 Q Can you please scroll to the attachment,
7 which I believe begins on Page 3.

8 Do you see there are timelines with years
9 represented from April to March?

10 A I do.

11 Q Is it correct that the first year shown
12 here would be 2017 to 2018?

13 A The years? '17?

14 Q Sure. If you scroll up to the top of the
15 document, it says -- is it correct it says, "70% of
16 Schools Will Score a 4 or 5 on the School Climate
17 Rating by 2020"?

18 A Correct.

19 Q And we previously stated that this email
20 was from February of 2017?

21 A Oh, yes, correct.

22 Q So I'm trying to make an inference that I
23 would like you to accept or correct, that the
24 timelines here would show the year starting with the
25 2017 to 2018 school year. Is that correct?

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
54

1 A Correct.

2 Q And so then the second line would be 2018
3 to 2019?

4 A Correct.

5 Q And then the next would be 2019 to 2020?

6 A Yep.

7 Q And then the last one would be 2020 to
8 2021?

9 A Correct.

10 Q Based on this draft timeline, was it the
11 goal that Tier II implementation would be a focus
12 for the 2019 to 2020 school year?

13 A Correct. We're trying to build our
14 capacity. There's so many schools in Georgia, and
15 Tier I was so woefully not in place across the
16 State. It's just the way that they approached
17 disciplined, that expansion was almost more than we
18 had the capacity to coach. So one of the things we
19 wanted to do was make sure we're going to build a
20 more robust Tier II capacity and start rolling it
21 out more comprehensively.

22 We worked with our technical assistance
23 advisor, which is Heather George. We certainly
24 partnered with one of here Tier II specialists, and
25 they walked us through how they scaled up Tier II,

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
55

1 and she certainly helped us develop, at least at the
2 beginning, a training curriculum and how we might go
3 about coaching that scale-up in Tier II.

4 So that was kind of our target. Like how
5 do we get there? Because the need was, was obvious.
6 We wanted to move in that direction, so we had to
7 put together -- I certainly put together a plan of
8 how we could get there.

9 Q So my question was, based on this draft
10 timeline, was it the goal that Tier II
11 implementation would be the focus for 2019-2020
12 school year; is that correct?

13 A Would be an additional focus. Tier I
14 would always be there, but layering on additional
15 menu, so to speak, of supports.

16 Certainly with schools that had a solid
17 Tier I in place, they were reaching out at the same
18 time as people that didn't have Tier I at all in
19 place. We need help, and then please help us move
20 up here. And so we had to put together a plan to do
21 that.

22 But, yes, it was a focus of our new
23 initiatives as we maintained what we had.

24 Q Was the goal of focusing on Tier II
25 implementation achieved in 2019 to 2020 school year?

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
56

1 A We certainly started rolling out some
2 initial training. There were a number of districts
3 that received kind of a cohort approach, but I would
4 say that it was probably the years that followed
5 that we really made the training our own and started
6 really launching more comprehensive trainings, until
7 of course COVID hit. But, yes, Tier II started roll
8 -- but I wouldn't say it was like all across the
9 State. We had limited capacity. So we had several
10 proficient specialists, and then we contracted with
11 the University of Florida and we kind of went at it
12 together.

13 I think Fayette County may have been one
14 of our first districts that we rolled this out in.

15 Q Based on this timeline, was it the goal
16 that Tier III implementation would be a focus for
17 the 2020 to 2021 school year?

18 A Certainly the development of a training
19 curriculum. I know that Dr. George said that it's
20 not certainly just training a school, but it's more
21 of a holistic way of assessing your Tier I system of
22 support.

23 But the goal would be that we would at
24 least be able to put this, and Tier III certainly
25 looked like a very aggressive plan, to put that in

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
57

1 place, but that was certainly -- I wanted to put a
2 plan on how it could be achieved, and if the stars
3 were to align.

4 Q Based on this draft timeline, was the goal
5 that Tier III implementation would be a focus for
6 2020 to 2021 achieved?

7 A No, it was not.

8 Q And why not?

9 A Well, one -- well, PBIS was no longer in
10 Special Education. It was certainly moved from
11 Special Education to the Office of School Climate
12 and Safety, and at that time I was the director of
13 curriculum instruction.

14 So I don't think they met that goal. And
15 then we're hitting into the year of COVID after
16 that, and then the desire for expansion of a lot of
17 these activities really went on pause.

18 Q You mentioned that PBIS was moved from one
19 office to another. Were you stating that could be
20 one reason why this goal was not achieved?

21 MS. JOHNSON: Object to form.

22 You can answer.

23 A It could be. Certainly any time that you
24 move an activity from one division to the other,
25 there's certainly a recalibration of some things.

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
58

1 It could be.

2 Q Has the --

3 A I wasn't --

4 Q Go ahead.

5 A But I wasn't supervising that at the time,
6 so.

7 Also, I left, I left in 2018 as the
8 manager. So there was a nice gap until the new
9 manager was hired. So you can imagine moving an
10 initiative forward when there's a gap in leadership,
11 that's certainly understandable.

12 Q How long was that gap in leadership?

13 A I don't recall. Several months, at a
14 minimum.

15 Q Has the goal of Tier III implementation
16 been achieved as of today?

17 A It has -- moving in the right direction,
18 but not wholly. We've got our Tier III training
19 curriculum, which is a huge significant step.
20 Getting the TFI and coaching people to look at the
21 Tiered Fidelity inventory at Tier III, so that has
22 been achieved. But the biggest piece is how to
23 actually train schools and district leadership teams
24 on how to assess Tier III really begins with the
25 training focus and coaching focus.

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
59

1 We've achieved the training curriculum
2 that we felt good with, now that we're in more
3 normalized school operations post-COVID, though. So
4 I think we're moving in the right direction.

5 Q You said you achieved the training
6 curriculum. Has the training been offered to any
7 schools yet?

8 A No, not yet. That I'm aware of. I don't
9 think we've done a -- I don't think we've done a --
10 I don't think we've launched any specific schools
11 that have been exposed to the training.

12 Q And this is the Tier III training,
13 correct?

14 A Correct. But we're going to be calling it
15 the advanced tiers, so we can -- schools don't have
16 an appetite for seven to nine days of training from
17 anybody. So we're trying to be more efficient with
18 our trainings and looking at Tier II and Tier III
19 simultaneously, which would be a more efficient way
20 to conduct training.

21 Q Is it correct that the Tier III training
22 that was recently completed but has not yet been
23 provided includes both Tier III and Tier II
24 implementation?

25 A It does. It does.

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

60

1 Q And when --

2 A Putting them --

3 Q Okay.

4 A That's okay. If I can interject.

5 We have a Tier III that can stand by
6 itself, we have a Tier II that can stand by itself,
7 but merging the two is what is happening as well.

8 Q Thank you.

9 A Yep.

10 Q And when did the Tier III curriculum get
11 finalized?

12 A I think we showcased that to a small
13 cohort of regional folks to get their feedback, and
14 I believe we did that maybe November of '22.

15 Q And is --

16 A Like before the --

17 Q I'm sorry. Go ahead.

18 A It was right before the holidays.

19 Q And has the combined more efficient Tier
20 II and Tier III training been completed?

21 A It has not.

22 Q When do you expect that the combined Tier
23 II and Tier III training will be completed?

24 A So the behavior, that can be completed
25 before the summer. But we certainly want to look at

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
61

1 ways to merge academic considerations within that
2 training. So we're certainly reviewing the
3 possibility of adding that as well. Because, again
4 --

5 Q But -- so sorry. Keep going.

6 A The goal -- okay.

7 The goal of MTSS again is not to really
8 define behavior and academics as if they act
9 exclusive of one another. The goal of true MTSS is
10 to have a comprehensive look at the child, their
11 behavior, and oftentimes is linked together and how
12 can be -- how can we do that better.

13 So we're having to actually do, just like
14 Michigan and Washington, and some other states, is
15 that taking the preexisting training curriculum that
16 has been siloed to behavior circles and academic
17 circles and how do we do this in a united
18 conversation to be more efficient with the way we do
19 business.

20 Q Who is the team working on the combined
21 Tier II, Tier III behavior and academic training?

22 A I know that -- the entire team has
23 provided feedback. I know that Sandy DeMuth has
24 taken a lead putting that together. Mimi Gudenrath
25 would certainly have a piece to play.

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
62

1 And I don't know the third individual
2 that's taking lead but I would say almost all the
3 specialists had a hand in looking at it and making
4 some feedback loops. That's accurate.

5 Q What is Sandra DeMuth's role?

6 A She's a part-time specialist today, funded
7 through the School Climate Transformation grant.
8 And largely her expertise has been management of the
9 SWIS training and implementation, but because she
10 has a lot of experience with Functional Behavior
11 Assessments and upper tiers of supports in her
12 career with special education, she's also one of our
13 trainers as well. So she goes and helps actively
14 train schools, district leadership teams, and RESA
15 school climate specialists.

16 So those are some of the things that she
17 does.

18 Q And what is Mimi Gudenrath's role?

19 A She has some of the same. They're both
20 considered national SWIS facilitators, of which
21 there is a small number. So Mimi provides that same
22 level of oversights, in addition to what's called
23 PBIS apps, which is a suite of applications at the
24 University of Oregon. Not only does it house SWIS,
25 but it also houses the uploads of the Tiered

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
63

1 Fidelity Inventory, as well as the Self Assessment
2 Survey called the SAS.

3 THE COURT REPORTER: I'm sorry. Slow
4 down. Just slow down, please.

5 A The Self Assessment Survey, which is SAS.

6 Q Are we good for me to continue?

7 A Is that for me? Or the court reporter?

8 MS. JOHNSON: I think everyone.

9 A I'm good.

10 Q The 2020 to 2021 school year, which is
11 shown at the end of this attachment, is 13 to 14
12 years after GaDOE initially created the first PBIS
13 team; is that correct?

14 A Yes, that's correct.

15 Q Why has it taken so long for GaDOE to be
16 able to support schools in their creation of Tier
17 III supports?

18 MS. JOHNSON: Object to form.

19 You can answer.

20 A Well, the State team at the beginning was
21 only four people. So four individuals only, with
22 the entire State of Georgia, to create an entire
23 change in the way that people look at behavior
24 discipline. A rather large task for four
25 individuals. It would take us probably -- I could

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
64

1 speculate how many decades it will take to make that
2 change.

3 So a lot of it had to do with taking our
4 four individuals and going to scale and like how
5 many more employees do we need, and what are the
6 regional coaches and how can we train them? Because
7 we're trying to build our capacity. Imagine taking
8 .5, that eventually became full-time in all the
9 different regional sites and us having to train
10 individual school requests, us training a cadre of
11 coaching supports that could lead to future capacity
12 building. It's a much taller order than you might
13 think.

14 It's not, it's not the same as the
15 academics, when people just assume, well, you don't
16 have these skills unless you immediately go remedy
17 those. We're actually trying to change the
18 philosophy as to how you look at behavior.

19 We're trying to tell and teach an entire
20 State of Georgia behavior is not accidental and it's
21 not on purpose, or it's not certainly geared to you.
22 Behavior does serve a purpose. It can be predicted
23 and it can be prevented. And discipline
24 exclusionary practices aren't the first line of
25 response, but that's a belief system in many states

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
65

1 that's been in place for many, many years, decades
2 and decades.

3 So if you think about it, what you're
4 trying to do is change an entire way of thinking
5 about preventing problems from happening, because if
6 you look at the entire decade of '80s and '90s, we
7 wanted to suspend our way to peace and prosperity in
8 the classrooms, in schools, and that was not -- that
9 zero tolerance approach was not yielding any fruits
10 at all.

11 So we came at it and said let's re-think
12 the way that we look at student discipline, re-think
13 the way that we look at behavior, and it's a much
14 tolerate -- more than we ever thought it would take.

15 Q Can you please control to Page 3, which is
16 the first page of the attachment.

17 Perfect. Do you see where it says, "70%
18 of Schools Will Score a 4 or 5 on the School Climate
19 Rating by 2020"?

20 A I do.

21 Q What is the school climate rating?

22 A The school climate rating system was
23 something developed by the Department of Education
24 to try to assess climate. No other state had really
25 undertaken the task of how do we know a school has

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
66

1 good climate. One doesn't matter and I think we
2 said yes, it does. Since it does matter, how would
3 we know if a school has good climate.

4 So the policy division under Dr. Garry
5 McGiboney started looking at different factors and
6 said, well, let's consider acceptance data, which is
7 important. So looked at the Georgia student head
8 safety survey and students responses on that, about
9 how they thought about their learning environment.

10 They weren't the only ones who
11 participated in those surveys. Teachers could. And
12 also parents. And they're all speaking to what they
13 think about the climate, in a number of areas.

14 So looking at participation rates with
15 those surveys was certainly an indication. Like if
16 no parent is really participating and weighing in on
17 what the climate is, it could be an indicator that
18 the school has a poor climate, otherwise why aren't
19 they putting their full measure of asking parents in
20 the community to speak about the school climate.

21 The other one would be looking at school
22 attendance. Certainly know that students attending
23 school could be interrupted by illness and things
24 like that, but we also know through research that
25 attendance to school by teachers and staff -- excuse

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
67

1 me -- by teachers and students, if they are all
2 coming to school, they probably would want to come
3 to school because the climate is really positive.

4 Other factors we'd look at, in-school and
5 out-of-school suspension rates. Does the school
6 have a history of and a pattern of exclusion
7 practices where they remove students quickly and
8 routinely for behaviors. Certainly, especially if
9 they're denying it. But what is the -- what is the
10 climate in the school, is it exclusionary or
11 inclusive.

12 So we kind of look at a lot of these
13 different factors and try to determine in our best
14 guess do we think this has a good school climate,
15 and they certainly created a star rating system,
16 with a one being the lowest and an indication of
17 really poor climate, five being the higher
18 indication that it has a really positive climate.

19 We knew and know that PBIS is a framework
20 to assist in improving that climate. And if that's
21 the case, we certainly would love to see -- make a
22 goal that we have for the majority of schools in
23 Georgia, because of our work, that would have four
24 and five school climate rating.

25 Q You mentioned a number of different

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
68

1 factors that can be looked at to determine how a
2 school's climate is and that are used for the school
3 climate rating.

4 Is it fair to say that access to
5 information like in-school suspensions and
6 out-of-school suspensions and attendance help
7 schools assess how their school climate is going?

8 A It could be a factor. Do they have a
9 history of exclusionary practices.

10 Q If a school didn't have access to some of
11 this information, for example, if it didn't have
12 access to attendance records, would it be harder for
13 that school or program to assess their school
14 climate?

15 MS. JOHNSON: Object to form.

16 You can answer.

17 A It could. I mean you certainly -- it's
18 hard to imagine in school -- every school has access
19 to that attendance data.

20 Q So is attendance --

21 A Analyzing --

22 Q I'm sorry. Go ahead.

23 A Sorry. Analyzing is another thing, of
24 course.

25 Q And so if -- so attendance is one of many

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

69

1 important factors when assessing a school's school
2 climate?

3 A It is.

4 Q And was the goal of 70 percent of schools
5 achieving a four or five on the school climate
6 rating achieved by 2020?

7 A I think you said why was the goal or did
8 we achieve the goal?

9 Q The question was, was the goal achieved?

10 A COVID happened by 2020, and we suspended
11 the school climate star rating the first year of
12 COVID, and it has been suspended since then.

13 But did we achieve it before the pandemic?
14 I did not bring that data with me, but certainly we
15 could -- a report can be run for that.

16 Q I'd like to show you what's going to be
17 marked as Plaintiff's Exhibit 971 -- I'm sorry. I
18 believe 972.

19 (WHEREUPON, Plaintiff's Exhibit-972 was
20 marked for identification.)

21 BY MS. CHEVRIER:

22 Q This is Bates No. GA03425886, and it's an
23 email from you, Mr. Hill, to Garry McGiboney dated
24 February 21st, 2017.

25 MS. CHEVRIER: I'll give my colleague a

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
70

1 moment to bring it up.

2 MS. LeVERT: Could you confirm the Bates
3 number one more time.

4 MS. CHEVRIER: It's GA03425886.

5 Thank you.

6 BY MS. CHEVRIER:

7 Q Again, Mr. Hill, this is an email from you
8 to Garry McGiboney dated February 21st, 2017,
9 correct?

10 A Correct.

11 Q And there are some people who are copied.
12 Is that correct?

13 A Correct.

14 Q Who is Deborah Gay?

15 A Deborah Gay, she's retired now, but she
16 was the deputy superintendent for Federal Programs,
17 and prior to that she was the director of Special
18 Education.

19 Q And with Deborah Gay, Zelfhine Smith-Dixon
20 is also copied. Who is Zelfhine Smith-Dixon?

21 A At that time, Zelfhine Smith-Dixon I
22 believe was the assistant director for Special
23 Education, but Deborah -- Deborah Gay could have
24 been promoted to deputy at that time, and then Zel
25 would have been the director. But memory escapes me

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

71

1 about when the promotion took place, so it's -- I'm
2 not really sure.

3 Q Do you recognize this email?

4 A Um, it's been a long time.

5 Q Do you have any reason to believe this
6 isn't an authentic printout of an email between you
7 and Mr. -- and Dr. McGiboney?

8 A No, I do not.

9 Q Do you see under a. where "the difference"
10 is highlighted?

11 A I do.

12 Q Do you see where you wrote: "We do not
13 have capacity to move beyond Tier I implementation
14 in 50% of LEAs. Research is telling us if we do not
15 help school districts develop their tiers
16 (especially classroom) within 3 years their
17 discipline trends begin to slowly reverse, as
18 teachers have not been helped to change their
19 practices"?

20 A That's correct. Research is based on Kent
21 McIntosh from the University of Oregon.

22 MS. JOHNSON: I'm sorry. Does he have
23 control? Can we scroll down?

24 MS. CHEVRIER: Yes, he does.

25 MS. JOHNSON: Were you done?

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
72

1 MS. CHEVRIER: I'm sorry.

2 MS. JOHNSON: Were you done?

3 MS. CHEVRIER: Sorry, Melanie. Would you
4 repeat yourself?

5 MS. JOHNSON: Were you just reading from
6 the body of the email just now?

7 MS. CHEVRIER: Yes, I was. Under where it
8 says, "The difference," and the difference is
9 highlighted.

10 MS. JOHNSON: Okay. Thank you.

11 BY MS. CHEVRIER:

12 Q So, Mr. Hill, whose research is it that
13 says that -- the research is telling you that if you
14 do not help districts and schools develop their
15 tiers within three years, their discipline trends
16 tend to begin to slowly reverse?

17 A That would be Dr. Kent McIntosh.

18 Q Thank you.

19 A His -- his research expertise is
20 disproportionality, but also looking at
21 implementation across the states. And we used to
22 say, when we were training in the beginning, it
23 takes three to five years to see change with
24 implementation of as many things in education, but
25 -- and we certainly were operating under like, hey,

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
73

1 it's going to take you three to five years to see
2 long-term change, and that was -- could be
3 frustrating to some districts to think it's going to
4 take that long to see all these changes take place.
5 So we would slow-walk how we introduce the concepts,
6 and not to push too hard so that we overwhelm
7 educator's ability to absorb new information and a
8 new way of thinking about discipline.

9 But then Kent McIntosh was saying, we've
10 got to figure out a way, because schools, because of
11 burn-outs, because of teacher turnover and principal
12 turnover, that -- and we certainly experienced that
13 in Georgia. You train a school, it changed, and
14 then you see a large-scale turnover, especially in
15 urban centers with principals, and then would be
16 requesting to be retrained.

17 And certainly we were trying to reflect on
18 how in the world do we go to scale quicker and give
19 them what they're able to absorb, and I think that's
20 why technical assistance centers are researching
21 this. But what is the rate of speed to affect
22 change quickly.

23 Brandi Simonsen from the University of
24 Connecticut, she was looking at, well, also don't
25 forget the implementation at the classroom level.

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

74

1 So putting all the tiers in place sooner than later
2 is important, but also teachers need to implement
3 these practices as well.

4 So now you can imagine how much is coming
5 in a school and their ability -- and this is only
6 one big initiative around behavior and climate. Now
7 add all the other things that could be taking place
8 with academic difficulties.

9 It becomes a daunting task, how much
10 change can a school take and the amount of time that
11 we would love to see it take place in. Sooner than
12 later, of course, is always the answer.

13 Q Is there concern within GaDOE about the
14 gap in time between the initial rollout of PBIS in
15 Georgia and the rollout of Tier III training and
16 implementation?

17 MS. JOHNSON: Object to form.

18 You can answer.

19 A That's what that -- I'm not sure of that.

20 Q So you're not --

21 A Concern --

22 Q Sorry.

23 A That would be a chief of staff, Mr. Woods,
24 what their concerns are. I certainly would speak in
25 my capacity to say that in my capacity, my concern

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
75

1 is how do we -- is how do we roll this out with
2 everything else that we're rolling out and the
3 school's ability to absorb change. Especially after
4 COVID. That's my concern.

5 Q At the bottom of the first page of this
6 email, you wrote, quote: "To repeat we provide
7 hardly any support to the classroom (despite the
8 need) or in Tiers 2 or 3 (despite the need)."

9 A That's correct.

10 Q Is there still a need to provide classroom
11 support?

12 MS. JOHNSON: Object to form.

13 You can answer.

14 A Absolutely. In fact, that's our heavy
15 investment area especially after -- especially after
16 COVID. It's not only just anecdotal, but schools,
17 districts, and their leadership certainly reaching
18 out to us saying please help us with teaching and
19 increasingly inexperienced teaching staff how to
20 implement space practices proactively in the
21 classroom. So please help us install that.

22 We can certainly -- it's a lot easier to
23 build non-classroom agreement, how you have
24 transition, how students enter the building, how
25 they exit locations, how do you encourage them in

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
76

1 all those non-classroom settings to have that
2 universal agreement and a prevention mindset, but
3 then taking that behavior change to each individual
4 classroom teacher to change their practice could be
5 more positive and proactive in their approaches.
6 That's a much larger task.

7 So helping the staff take that on, how to
8 build a faculty, special leadership teams. Capacity
9 to support those teachers in those specific areas
10 certainly takes a more strategic approach, and that
11 is the State developing them, coordinating training
12 curriculum, a coaching model, training RESA school
13 climate specialists to assist us in that way.

14 There's a lot of teachers in our state,
15 and it begins with at least taking it on. So far we
16 got 250 schools that have kind of did a deep dive
17 into what proactive classrooms should be looking
18 like, how they could support those teachers.

19 Q So does GaDOE currently provide classroom
20 support?

21 A We do through this training, but we also
22 do this through our school climate specialists at
23 the RESAs. They also deliver this training.

24 And there are a number of district
25 coordinators who we think we've built capacity, and

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

77

1 like in some of the metro areas, in particular like
2 Cobb County, Forsyth County, to name just a couple,
3 where they're proficient to train on their own
4 without us having to be there present and to coach
5 them at the training. They can take it and run with
6 it, so to speak.

7 Q How frequently are these trainings
8 provided to schools that are receiving classroom
9 support?

10 A Well, they're scattered throughout the
11 year based on request. So I can't say that it's --
12 like in the beginning days, when PBIS first got
13 started, we would only train in the summer, and that
14 would take up a school's limited number of days that
15 they could tackle preplanning. So then after a
16 while we started training and providing them
17 throughout the years.

18 So I would say certainly the concentration
19 would be the month that there's no formalized
20 testing happening, like Milestones for Georgia. So
21 you probably see a lot of those things in the fall,
22 after school. And you may see some extended in the
23 summer, and some would be in the spring, but not to
24 interfere with testing.

25 And we've certainly being experimenting

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
78

1 with how do we do this virtually. So we've
2 certainly had to adapt to hybrid models of training.

3 To the question of do we have a
4 predictable frequency that we offer, I would say the
5 answer is no. Upon request, upon, schedule, upon
6 availability, we try to be as flexible as we can to
7 the schools and districts.

8 Q If the school requests classroom support
9 for PBIS, how frequently could they receive that
10 support?

11 A Well, it would be training the school team
12 on how to coach that change, not to the specific
13 teachers. But they could receive that training --
14 they would only really want that once a year,
15 because they wouldn't have the capacity for a
16 leadership team away, with a limited number of
17 substitute teachers that we have these days. We
18 have that more than a one-day or two-day kind of
19 training event.

20 Q Is it accurate to say that the support
21 GaDOE provides to classrooms is done in terms of
22 training to individuals who then teach the practices
23 to teachers within individual schools?

24 A I think it would be more accurate to say
25 that the training certainly would take place to

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
79

1 district coordinators, school climate specialists,
2 who in turn would -- full faculty -- not the entire
3 faculty, the leadership team. And it's through that
4 leadership team they drive the change at the
5 classroom level.

6 Q How many schools have participated in this
7 type of training model?

8 MS. JOHNSON: Object to form.

9 You can answer.

10 A By the end of '21-22, 250, but we also
11 know that several schools have participated in
12 training this year. So that number is -- at the end
13 of this year that number will be higher.

14 Q Other than increasing the number of
15 schools who receive such training, does GaDOE have
16 any concrete plans to expand providing such support?

17 A We certainly do. The demand signals are
18 very heavy in that area.

19 Q What are those plans?

20 A The biggest plan is take the current
21 training and figure out how to merge some of the
22 Tier I academic proactive features that should be in
23 place and how could we merge it into this training
24 so that it's more holistic.

25 Right now we've got, we've got the MTSS

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
80

1 team and some of the PBIS members, who are really
2 one team. I only say them differently just for
3 context. But they're actively looking at the
4 current training and how do we fit this in without
5 overburdening districts who say I don't have two
6 more days, I can't attend a two more day training.

7 So we're trying to figure out, you know, a
8 hybrid approach, and how do we deliver not only the
9 behavior pieces but also looking at some of the
10 academic pieces.

11 Q Are the plans to expand this support
12 documented or memorialized anywhere?

13 A I don't think we've put it on a strategic
14 plan update. Right now it's -- it's mostly an
15 outline, goal setting that we have.

16 Even the strategic plan that you -- that
17 we've looked at today, it's going to require us to
18 actually crack that open and adjust that, adding
19 some academic pieces and what that might look like.

20 Q You mentioned that the strategic plan we
21 were reviewing earlier was receiving revisions.
22 What are the revisions that it's in the process of
23 receiving?

24 A That hasn't happened yet. We haven't
25 opened it and started writing it yet. Right now

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
81

1 what we're doing is forming the team. For example,
2 I have three job vacancies. So we're actually
3 putting the team together.

4 And you certainly heard me make mention of
5 the TFI. One of the things that we're doing is
6 taking a document called the Tiered Fidelity
7 Inventory for academics, that the Department of
8 Education for Virginia has taken from the Michigan
9 project, and that the Michigan project, through
10 Steve Goodman, has developed a TFI for reading and a
11 TFI for mathematics.

12 Now, I've already said the word "TFI"
13 several times with behavior and this. You can
14 imagine the school receiving so many TFIs that it
15 would be like I don't care what you're selling, I'm
16 not implementing because I can't take that many
17 fidelity tools.

18 What Virginia did was try to harmonize
19 them and just look at academics universally.

20 What we're doing is saying, is that a tool
21 that Georgia might be able to use to help achieve
22 our integration of MTSS with academics and MTSS for
23 behavior.

24 So that review is taking place right now
25 with our school improvement office, taking a look at

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
82

1 the academic TFI that the Virginia Department of
2 Education has developed, and asking if we can make
3 some modifications so we can have harmony.

4 So for the prevention-based team,
5 improvement, to kind of react to you're on a
6 federally identifiable list. Well, it certainly
7 would behoove us to have harmony with that addition
8 in many ways. So that's what we're doing right now.

9 Q Is there still a need to provide support
10 outside of training for Tiers II and III?

11 MS. JOHNSON: Object to form.

12 Object to form. You can answer.

13 A You say is there a need to provide
14 training outside of --

15 Q Sorry. Let me repeat.

16 Is there a need to provide support outside
17 of training to schools for Tier II and III?

18 A Absolutely. That support would be in the
19 form of individualized coaching, site visits,
20 talking to leadership teams, helping them to assess
21 themselves.

22 If a school team takes the TFIs and say I
23 think we have all these things in place, an outside
24 coach through the RESA school climate specialist,
25 and in conjunction with the district coordinator,

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
83

1 maybe even a coach from another school can come in
2 and provide that assistance.

3 On the rare occasion where we -- we don't
4 really have a focus capacity to do that. We
5 certainly could coach that. And if we were in
6 individual schools all the time, that would prevent
7 us from doing more strategic things. Certainly that
8 does take place.

9 Q So GaDOE does currently provide support
10 for Tiers II and III for individual schools?

11 A Indirectly. There are some schools that
12 we have trained, but it's not our chief focus. Our
13 chief focus is to build capacity, to train district
14 coordinators, and RESA climate specialists. But we
15 have training in schools.

16 Q Outside of training, does GaDOE provide
17 any support for Tiers II and III currently for
18 individual schools?

19 A Individual schools? We sometimes model
20 walk-throughs, as we try to model for district
21 coordinators of the effort. But largely that would
22 be at the Tier I, possibly classroom, maybe looking
23 at Tier II systems.

24 When it comes to Tier III, the support
25 might only be looking at the Tiered Fidelity

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
84

1 Inventory.

2 Q Does GaDOE have any concrete plans to
3 begin providing support other than training
4 regarding Tier III?

5 A I would say right now the immediate plan
6 is looking at Tier III through training curriculum
7 and some follow-up coaching, help the district look
8 at its system, but not at the school level.

9 Q How does GaDOE set expectations for
10 schools regarding the implementation of PBIS?

11 A Someone created a network of district
12 coordinators of PBIS and the RESA school climate
13 specialists. So we -- this kind of network, they
14 meet frequently, quarterly certainly, and many times
15 monthly, not just email distributions but onsite
16 meetings, especially after COVID. So they will meet
17 in Macon. We'll meet with a RESA school climate
18 specialist. We'll meet then the next day with a
19 school climate specialist and the district
20 coordinator of PBIS, which RESAs -- I mean GNETS
21 typically send a coach. About 50 percent usually
22 participate in the face-to-face meetings.

23 But at those meetings we relay
24 expectations about timelines of activities that need
25 to take place, how we can support them, what they're

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
85

1 seeing on the ground, how we can improve their
2 training and coaching approaches.

3 We're certainly by the spring trying to
4 communicate if there had been any changes in how
5 schools would be recognized for fidelity. We have
6 those conversations in person before the school year
7 ends.

8 But those things happen that way. It's
9 regular and routine and it's been that way for a
10 number of years.

11 Q How does GaDOE communicate expectations
12 for schools regarding the implementation of PBIS?

13 A In the same way. Through that network and
14 meetings. I can repeat it again.

15 We meet quarterly, oftentimes in person,
16 and then we meet -- we certainly have those
17 meetings, like webinars monthly, and it's a lot of
18 checkups about different levels of implementation,
19 how to improve implementation.

20 Q Is there an expectation that schools using
21 the PBIS framework will eventually offer all three
22 tiers based on student needs?

23 A Certainly it's the expectation that they
24 would fully develop their systems of support. I
25 think that's certainly the goal with PBIS, from its

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
86

1 outset.

2 Q Does GaDOE share what fidelity measures
3 schools should use to assess the efficacy of their
4 PBIS framework?

5 A We do.

6 Q And what are those fidelity measures?

7 A Well, largely -- we've mentioned the TFI.
8 The TFI is certainly maybe a cornerstone of looking
9 at what fidelity should be at the early years.

10 We use the benchmarks of quality that, for
11 instance, South Florida developed, but soon we start
12 to -- when I was program manager, I shifted us from
13 the benchmarks of quality that only assessed Tier I
14 fidelity and shifted to the TFI, because the TFI, at
15 least it started to ask there's one, two and three.
16 For the first time we had a tool, and I thought if
17 we're ever going to really achieve banning to the
18 tiers of support, we needed to have a tool that was
19 more comprehensive than what we were using.

20 So while we may not have had capacity to
21 train, let's go ahead and start using and
22 introducing a tool that would have capacity. So
23 that's what we used.

24 And for the first couple of years, a
25 school should be looking at and making sure it has

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
87

1 fidelity at Tier I, but as the years progressed,
2 certainly looking and analyzing the Tier II and Tier
3 III systems, which schools are certainly able to do.

4 Not only -- when I say tier tool,
5 remember, it's a small group of educators, probably
6 six to eight, could be a little bit larger, and
7 that's a problem solving team that we try to install
8 at every school.

9 If a school team were to assess itself and
10 say we think our Tier I, II, and II systems are
11 fully in place and functional, we try to balance
12 that with a Self Assessment Survey. Early I called
13 it the SAS, or S-A-S, and that is an inspection
14 survey, where we at least like to see 60 percent of
15 teachers also speak. Well, do you think it's in
16 place? This problem solving team, they think all
17 these pieces are in place, and it's a supportive
18 environment, that's proactive and preventative, but
19 what does the faculty say.

20 If the faculty in large measure disagrees
21 with what -- the school team, that's when a coach
22 would come in and try to harmonize that and say,
23 here, the school team, problem solving team, thinks
24 these things are in place, faculty disagrees, let's
25 look at where the faculty disagrees and let's make

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
88

1 those goals. So let's now take that Self Assessment
2 Survey again, and now let's take this assessment a
3 little bit more honestly, potentially.

4 So some of those tools help us assess a
5 school's fidelity implementation, and we provide
6 support on how to use the Self Assessment Survey and
7 the Tiered Fidelity Inventory, and if they are
8 assessing all three and they participated in Tier I,
9 II, and classroom level training, certainly we think
10 a school is a little bit higher fidelity
11 implementation than another school.

12 Q You personally answered this question
13 already when you said you made some changes to what
14 fidelity measures were used, but how -- who
15 determined what fidelity measures are used by
16 schools in Georgia?

17 A Well, the state team would -- the state
18 team and the leadership of the state team, we
19 certainly look at how we assess fidelity. Again,
20 simple fidelity is, you could say -- researcher
21 might say the tools, the coaching tools, and set it
22 up placing a score to it above 70. You could say,
23 well, that's enough. But Georgia looked at it and
24 said maybe we should look at some other features.

25 These are voluntary, but each state, I

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

89

1 would say, is a Petri dish for the PBIS
2 implementation across the country. Every state can
3 add some things to it. We certainly consult with
4 national TAs and say what do you think, what we want
5 to do is we want to add some pieces to it to make
6 sure we have fidelity.

7 Because certainly I could expect and walk
8 in a school and quickly my own self, I could say,
9 this school has it, this school does not have it.
10 This school is implementing all the features, this
11 school may be not the features, but that's quite
12 extensive. So we use these other tools to help us
13 in that regard. But it would be a state team to
14 determine that.

15 A lot of times the state team would not
16 just arbitrarily say we're changing all these
17 factors. We would certainly create feedback loops
18 with our school climate specialists and a few sample
19 district coordinators and say the way we're
20 assessing it, we've got feedback from our national
21 TAs, we're also asking you all, hey, you're going to
22 be the ones helping us inspect this, what do you
23 think we have here, and then we certainly make a few
24 course corrections.

25 If we were to make any changes today, we

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
90

1 would certainly send any changes through our Policy
2 Division. So they would now be creating a new
3 policy. So the Policy Division would weigh in and
4 certainly they may ask some additional questions.
5 So it doesn't happen in a vacuum.

6 Q Is that -- is that policy division within
7 the Office of Whole Child Supports or outside of it?

8 A Outside of it.

9 THE COURT REPORTER: I'm sorry. Off the
10 record.

11 (Discussion ensued off the record.)

12 MS. CHEVRIER: Let's go of the record for
13 moment.

14 MS. HERNANDEZ: Off the record now at 5:55
15 p.m.

16 (Discussion ensued off the record.)

17 MS. JOHNSON: We are ready. I lost video
18 but we can start and I'll just let it go while
19 we're starting.

20 MS. CHEVRIER: I'm ready as well.

21 THE VIDEOGRAPHER: We are back on record,
22 6:03 p.m.

23 You may proceed.

24 BY MS. CHEVRIER:

25 Q What is SWIS, Mr. Hill?

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

91

1 A I stated at the very beginning, Schoolwide
2 Information System.

3 Q Are schools that use the PBIS framework
4 required to use SWIS?

5 A Traditionally, we have maintained that
6 schools implement -- or use SWIS the first year, the
7 implementation year, and primarily that is to gain
8 exposure to the data elements that it provides, so
9 that schools can make informed proactive decisions,
10 because most school information systems don't have
11 the type of proactive data that would lead to good
12 problem solving.

13 (Discussion ensued off the record.)

14 Q If a school chooses to no longer use SWIS
15 after it's initial implementation year, how is data
16 tracked by that school?

17 MS. JOHNSON: Object to form.

18 You can answer.

19 A I think you asked if a school chooses not
20 to use it?

21 Q Correct. Then how do they track data?

22 A They take -- now, just because they don't
23 have all the data pieces that SWIS has and the drill
24 down capabilities doesn't mean the school
25 information systems aren't close to that. So

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
92

1 they -- many times they collect very similar data
2 pieces, have some functionality when it comes to
3 providing school leaders, two-dimensional graphs,
4 trend data, and things like that, but it's probably
5 not -- it's not as good as SWIS. So they do the
6 best that they can. They just work with what they
7 have.

8 Q Does GaDOE monitor how schools are
9 tracking the data?

10 A Well, through the PBIS disciplines, those
11 that voluntarily work with us, we certainly monitor
12 the data they submit.

13 Q How many schools currently use SWIS?

14 A Total at the end of '21, '22, 441 schools
15 in Georgia. Although that may actually be around a
16 steady number. So about 441 schools continue to use
17 SWIS, and I think, from what I've gathered, 10 GNETS
18 continue to actively use SWIS.

19 Q How does GaDOE monitor the implementation
20 of PBIS in schools?

21 A Well, we have an end of the year -- I know
22 earlier you mentioned EOY, but we have an end of the
23 year process that is basically our fidelity
24 collection process, of which the TFI scores that
25 we've talked about a few times would just be one of

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
93

1 those main elements. But we have an online way that
2 we collect the data, so it's more automated, so
3 schools are no longer faxing us things, but they
4 submit it online. And we set the criteria about
5 every two years without changing all the time.

6 Q And does GaDOE require -- I think you've
7 already answered it, but I'll go into more detail.

8 Does GaDOE require any reporting from
9 schools related to PBIS?

10 A As far as fidelity goes?

11 Q And any other data that schools --

12 A Correct. They would submit voluntarily
13 some data elements. Discipline data, fidelity
14 scores and participation rates, with TFI, the Self
15 Assessment Survey.

16 So they would submit those data pieces as
17 well.

18 Q And did you say --

19 A And all of --

20 Q Sorry. Go ahead.

21 A They're all -- all schools in Georgia have
22 to submit the discipline data, any time it results
23 in an office referral that would result in an
24 in-school suspension or out-of-school suspension.
25 So they are already doing that. We have the PBIS

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
94

1 schools kind of put something in this database
2 system voluntarily before the superintendent signs
3 off with the district so they can assess fidelity.

4 Q How many schools do submit that data
5 that's voluntary to the PBIS team?

6 A Well, so that the official list that I
7 mentioned, the 1,419 number at the end of '21-22,
8 those would be the -- there could be schools that
9 would say they're doing PBIS, and they may. They
10 may be implementing. But the official count would
11 be what is submitted to us as official participants.

12 So at the end of '21-22, it's 1,419. But,
13 again, we think that number is going to be over
14 1,500 by the end of this year.

15 Q In addition to exclusionary discipline,
16 what other factors or data are those schools asked
17 to voluntarily submit to PBIS?

18 A Again, they're submitting -- the Tiered
19 Fidelity Inventory, the times when they took the --
20 when they took that assessment, which is twice a
21 year, in the fall and the spring typically; when
22 they took the Self Assessment Survey and balanced
23 those scores; potentially dates when they've taken
24 walk-throughs. And at this point it's like three
25 pages of little things that they're submitting, that

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
95

1 certainly are available on the web page. And we can
2 submit a hard copy to you as well.

3 But certainly participated in the training
4 that we have sponsored with our curriculum. We may
5 not have been the state team to deliver it, but as
6 long as it's the training we helped facilitate.

7 There's also some -- I'm feeling I might
8 be speaking too fast.

9 Am I good?

10 THE COURT REPORTER: Okay.

11 A There's also --

12 THE WITNESS: Thanks. That will go to
13 reflect the court reporter. I want to make
14 sure I'm being cautious of that.

15 A There's also some outcome data looking at
16 the percentages of students that we would say are
17 Tier I with office referrals, and we'd love to
18 see -- when they submit those office referrals, we
19 plug them into a calculation with the number of
20 students that are enrolled so we can kind of look at
21 that triangle, that you may be familiar with, how
22 many students in fact are at Tier I, in fact how
23 many students might be in Tier II and Tier III.

24 But in particular, we want to see in
25 high-fidelity implementation 80 percent or higher of

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
96

1 students that receive no referrals or maybe at most
2 one. One behavior accident, so to speak. And those
3 are the kind of data pieces we're looking at.

4 If you want to be considered a
5 distinguished PBIS school, someone who has
6 participated in Tier I, Tier I classroom, Tier II,
7 and is also looking at all elements of the, of the
8 TFI, as long as they have no zero corporal
9 punishment incidents, which PBIS would certainly not
10 be in support, even though it's a legal practice.
11 To be a distinguished school, we would, we would
12 certainly look at that not being an idealized form
13 of punishment. And certainly it's not on a
14 consistently dangerous list.

15 Q How is the data transmitted to GaDOE
16 through schools?

17 A With a Jotform that would be contained
18 inside the SLDS, student -- State Longitudinal Data
19 System. The district coordinator would kind of go
20 through there and submit the data and help us
21 calculate some of those pieces.

22 Q Do regional GNETS programs have the same
23 GaDOE PBIS reporting requirements as general
24 education schools?

25 A They do, but certainly we -- we certainly

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
97

1 take considerations, but, you know, but, in general,
2 yes.

3 Q And do regional GNETS programs submit
4 their EOY data through the same portal as general
5 education schools?

6 A Because they are a program, they won't
7 have access to the SLDS. So they will submit -- to
8 my knowledge, I think the way that we're doing that
9 is through the Jotform that the district coordinator
10 would send to their state contact. We take our
11 state staff and slide them across the -- regionally
12 across the State. So it's my understanding that the
13 GNETS in that particular region would send it to
14 their state contact.

15 Q Are regional GNETS programs required to
16 provide any additional metrics that general
17 education schools do not need to provide?

18 A It is not my understanding that we do that
19 today, but I know that when I was a program manager,
20 we certainly looked at trying to come up with
21 something that looked a little different maybe. Not
22 a new process, but right now what we have in place
23 is for all the schools and programs.

24 Q It sounds like you discussed having
25 different data requests in place. Were those

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
98

1 different data requests ever implemented?

2 A Well, again, when a school -- most of it
3 was just definitions. If the school -- what a
4 school calls an office discipline referral GNETS may
5 not call an office discipline referral. A lot of it
6 was just walking through the definitions and how
7 those definitions might apply just a little bit
8 different than a GNETS environment.

9 Q How is PBIS data assessed by GaDOE?

10 A Well, again, we have some criteria that is
11 available online, but kind of look at defining what
12 we would see is installing PBIS school, one that's
13 emerging, one that's operationalized, the
14 components. And one that's moving in distinguished
15 areas.

16 Q Are regional GNETS programs held to the
17 same standards when evaluated for the categorization
18 you just described, emerging, installing,
19 operational, and distinguished?

20 A They are.

21 Q And does GaDOE publicize which schools
22 have achieved what category level?

23 A We do. We put that on the web page, where
24 the PBIS page at GaDOE put that published list of
25 schools and programs.

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

99

1 Q I'd like to show what is being marked as
2 Plaintiff's Exhibit 973. This is Bates No.
3 GA03429605.

4 (WHEREUPON, Plaintiff's Exhibit-973 was
5 marked for identification.)

6 BY MS. CHEVRIER:

7 Q It is an email from December 5th, 2017.

8 Can you confirm, Mr. Hill, this is an
9 email from Sandra DeMuth to Vickie Cleveland and
10 Nakeba Rahming, and that you and others were copied
11 on the response from Nakeba Rahming?

12 A I can confirm that.

13 Q Do you recognize this email?

14 A A long time ago but --

15 Q You have control over it if you want to
16 scroll through.

17 And just to confirm, you do recognize this
18 email?

19 A I don't remember the email, but I'm sure
20 that it occurred. I'm seeing that I'm cc'ed on it.

21 Q Who is Vickie Cleveland?

22 A Vickie Cleveland is in the Special
23 Education Division under the office of Federal
24 Programs, and I believe that she is now the liaison
25 person for GNETS. I could be correct. I think

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

100

1 that's what I understand.

2 Q And who is Nakeba Rahming?

3 A She's no longer with the agency, but at
4 the time she was the deputy superintendent. But
5 before she was deputy superintendent, she was the
6 agency's point person for GNETS.

7 Q Do you see where Sandra wrote: "For the
8 schools they have to be at a minimum percent to meet
9 the emerging, operational or distinguished
10 standards. For GNETS, they can certainly submit the
11 percent at Tier I but not at the same criteria for
12 schools, which would not be equitable. However,
13 maybe we could ask them to submit the percent of
14 students who transition to LRE, whether that's
15 partial or full day"?

16 A Was that -- I don't know if that's a
17 question. I did see the sentence, though.

18 Q You do see where that -- where Sandra
19 wrote that?

20 A I do.

21 Q When Sandra wrote percent at Tier I, is
22 that the percentage of students in a school who
23 received Tier I services?

24 MS. JOHNSON: Object to form.

25 You can answer.

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

101

1 A Looking at the students that -- who are
2 able to stay in what would be a classroom
3 environment at Tier I. Again, for a lot of us,
4 we're asking -- this is a nice conversation, how we
5 were talking about how do we assess fidelity in this
6 unique environment.

7 So is an office discipline referral, an
8 ODR, is that the same at a school versus GNETS? And
9 what's a fair way to assess fidelity? And I think
10 it's part of a conversation. How do we know that
11 these environments -- a little bit different, even
12 more so than an alternative school.

13 Q Is it fair to say that Sandra was
14 proposing that the regional GNETS program's PBIS
15 evaluation look at whether students were
16 transitioning out of GNETS and into a less
17 restrictive environment?

18 MS. JOHNSON: Object to form.

19 You can answer.

20 A Correct.

21 Q Was that evaluation measure ever
22 implemented?

23 A I don't recall.

24 Q And is it currently?

25 A I --

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
102

1 Q I'm sorry. Go ahead.

2 A I felt like that -- it was the year before
3 I transitioned, but I felt like we were putting in a
4 recommendation that I thought we put in place. I
5 just don't recall.

6 Q And is that evaluation measure currently
7 in place?

8 A It is not. That was changed.

9 But, again, all the end of the year
10 criteria for fidelity, it typically gets tweaked --
11 it used to get tweaked every year, and I
12 implemented, which has remained, whatever decisions
13 are made on how you're going to calculate this, do
14 it in two-year increments to not cause too much
15 change, so there's at least some amount of
16 predictability, because you can tweak these things
17 to death, and that's certainly -- we wanted to avoid
18 that, constantly changing what's expected.

19 Q Does GaDOE use the data you receive from
20 schools to determine areas of need for future
21 training?

22 A We do. We work in conjunction with the
23 school climate specialist and district coordinator,
24 which we kind of call like a trio relationship.
25 Hey, what do you think your needs are and what kind

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
103

1 of menu support can you provide for it.

2 Not only in an in-person environment but
3 now looking at hybrid training environments as well.

4 Q Does GaDOE use the data received from
5 schools for any other purposes?

6 MS. JOHNSON: Object to form.

7 You can answer.

8 A Outside of me, I'm not sure. School
9 improvement may look at the data to assess if they
10 need -- if they are identifiable lists. I know the
11 data that I have, what we have and how we used our
12 parts in our office.

13 Q Outside the Tier I, Tier II and Tier III
14 trainings that we discussed earlier, does GaDOE
15 provide training to school districts about PBIS?

16 A Well, certainly we have what we'd call
17 booster trainings. That is a school could have
18 participated in a two- to three-day live training
19 event. And over the years, where there's been some
20 kind of faculty attrition, we may go in there and --
21 certainly if there's a new principal. We wouldn't
22 force a school in only three to four years to
23 take -- you know, to participate in a full measure
24 of the training. We would go through and use the
25 TFI and say, well, how about we develop booster

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
104

1 training and let's kind of reinstall or revisit some
2 of the pieces that didn't take, that didn't take
3 hold.

4 So I would say booster training would be
5 one example.

6 We could also use a problem solving kind
7 of a protocol that would be outside the standard
8 training. So what are other areas that could be
9 causing your school not to be successful, and maybe
10 it's just focusing what the deep dive on, on
11 attendance may be, or maybe even -- maybe looking at
12 a particular incident so we can fine-tune some
13 pieces that are all attached to this, if that makes
14 some sense.

15 Q Who provides these trainings?

16 A The State would provide some. The school
17 climate specialist could provide some as well,
18 sometimes in conjunction. And then the appointed
19 district coordinator of these efforts could do the
20 same.

21 Q And who provides the trainings for
22 individual schools?

23 A Well, it could be a combination of all of
24 us. It just depends. We would rather they train
25 the RESA -- the regional RESA school climate

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
105

1 specialist and coordinators to build capacity, but
2 if there's turnover in those other pieces, the State
3 sometimes comes in and models the training and
4 actually conducts the training themselves.

5 Q And what is the name of the GaDOE office
6 that is currently responsible for PBIS?

7 A Office of Whole Child Supports.

8 Q And I believe you stated earlier that this
9 office has not always been responsible for PBIS. Is
10 that correct?

11 A This office is relatively new. Prior to
12 PBIS being the Office of Whole Child, it was in the
13 Office of Teaching and Learning, and it was placed
14 under me when I was the director of Curriculum
15 Instruction.

16 Prior to that, it was in the Office of
17 School Safety and Climate, and prior to that it was
18 in the Office of Special Education. Which is not
19 too uncommon across the country for PBIS to be
20 housed in a variety of places.

21 Q When did these changes occur?

22 A From Special Education to a new Office of
23 School Climate and Safety, I think that was around
24 2019. And -- but I don't know the exact month and
25 date because I moved over to Teaching and Learning

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
106

1 and Curriculum Instruction.

2 The move to Teaching and Learning as the
3 Office of School Safety and Climate was
4 disassembled, it seemed like it happened right at
5 COVID, or right before or right during. I'd have to
6 look at -- I'm not sure of the exact month that we
7 transitioned.

8 The move to the Office of Whole Child
9 happened with my move, around October 15th of 2022.

10 Q What prompted these changes?

11 A I think mainly the fact that I had been a
12 part of PBIS from its inception. So me having the
13 most experience leading the work and having worked
14 with a lot of the national -- national folks, it
15 probably makes a lot of sense for PBIS to travel
16 with me.

17 But also have the other task of taking the
18 MTSS academic framework, which has a similar
19 mentality and prevention base things, and what the
20 hearing out in the field is that we have two
21 frameworks doing similar work, talking similar
22 languages, coming out of two offices. Schools are
23 setting up two to three different teams, looking at
24 some of the training data stats. Let's go about the
25 business of merging them. And I think the decision

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

107

1 was, well, we think Justin can merge those two. And
2 certainly we're trying it.

3 I think those are the reasons that it was
4 prompted.

5 Q Within the office of Whole Child Supports,
6 what is the internal team that focuses on PBIS?

7 A Well, when it first came over, it was just
8 the PBIS team. If I could just kind of restate, my
9 job is to take the PBIS team and all the functions
10 of PBIS that will not go away, and merge the other
11 -- again, PBIS is an MTSS framework. PBIS is a
12 multitiered system. It's just exclusively focused
13 on behavior to improve climate.

14 MTSS in the State of Georgia and other
15 states typically has had use of academic focus, but
16 they approach problems prevention-wise and
17 response-wise the same way. MTSS should be together
18 looking at academics and behaviors simultaneously.

19 PBIS is not going away and the core
20 precepts of PBIS is not going away. My task is to do
21 what Michigan has done, what Wisconsin is trying to
22 do, what Washington has done and Florida has done
23 and actually create a true MTSS system where
24 behavior is balanced with prevention systems for
25 academics.

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
108

1 So it's not going away, but when I say --
2 when we call -- the new team is essentially called
3 the Georgia Tiered System of Support. And what
4 areas do we support? Academics and behavior.

5 Q How many people in the Office of Whole
6 Child supports work in some capacity on PBIS?

7 A I've got three openings that we're hiring
8 for. So add that to nine full-time, three
9 part-timers.

10 Q And what are the roles of the nine
11 full-timers?

12 A Well, one's a senior program manager. So
13 that person is helping to organize and manage the
14 work.

15 Then I have one other manager for digital
16 resources, who is helping to build more classroom
17 digital resources for teachers, something we learned
18 during COVID that was an expressed need.

19 But the rest of the staff, I would
20 consider them the regionally assigned in the State,
21 to support capacity building at the RESA home
22 districts.

23 Q And what are the credentials for these
24 different employees in the different roles?

25 A Most, if not all, have Master's degrees.

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
109

1 Many of them had experience either implementing PBIS
2 at the building level, supervising PBIS at the
3 district level. We have a few former GNETS
4 directors, and then ones from the Michigan MTSS
5 project.

6 So everybody has some stake or experience
7 level with implementation, from the State, region,
8 or school level. They bring all those skills
9 together to help us build a team.

10 Q What are the salaries for these employees
11 in their different roles?

12 A I can't give you a specific breakdown of
13 everyone's salary, but I would say the specialist
14 level, an average would be mid to upper eighties.
15 Whereas managers would typically be from lower
16 nineties to the lower-upper nineties.

17 Part-timers --

18 Q Are these provided by GaDOE --

19 THE COURT REPORTER: I'm sorry, Claire.

20 (Discussion ensued off the record.)

21 BY MS. CHEVRIER:

22 Q The transcript ends, Mr. Hill, with you
23 saying that managers would typically be in the lower
24 nineties to upper nineties for salaries.

25 Could you continue with what you provided

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

110

1 previously as far as the different roles and what
2 salaries they earn?

3 A Sure. The part-time staff, mid to low
4 forties. And the specialist would be at the mid to
5 high eighties. And the managers would be in the low
6 nineties to upper nineties.

7 Q Thank you. And my next question was, what
8 funding is provided by GaDOE that is used to support
9 PBIS?

10 A We have -- most of our part-timers are
11 being funded through a school climate transformation
12 grant, which expires 30 September this year. The
13 lion's share of the funding streams comes from IDEA
14 discretionary dollars, but we also have from the
15 Georgia General Assembly and the Governor's budget
16 funding for two full-time staff with state dollars.
17 So we have two state dollars, we have one grant, and
18 the rest IDEA.

19 Q Let's go each line item for the GaDOE
20 school climate team or what you have stated is the
21 Georgia tiered system of support team as it relates
22 to PBIS.

23 What is the total amount of money for
24 staff in this team?

25 A I could use the calculator and just --

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

111

1 real quick.

2 Q Well, if you want, we can go staff member
3 by staff member, so that we don't have to do math on
4 the fly.

5 A We can do that.

6 The first staff member is Jeannie Morris.
7 She's the senior program manager. Her base salary
8 is \$98,000.

9 THE VIDEOGRAPHER: I was checking to see
10 if it was possible to take the document down if
11 we're not using it at this time.

12 MS. CHEVRIER: Yes. Thank you. We can
13 remove the document.

14 Q Go ahead, Mr. Hill.

15 A Did you hear the first -- did you hear the
16 first staff member, by chance? Jeannie Morris?

17 Q Yes. It's in the reporting.
18 Go ahead.

19 A Dr. Susan Barrow, education program
20 specialist for PBIS, \$89,621.

21 Anthony Feldmann, education program
22 specialist, \$90,729.

23 Benjamin Moore, education program
24 specialist, \$87,619.

25 Amber Phillips, education program

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

112

1 specialist, \$80,000 even.

2 Shannon Weist, W-E-I-S-T, \$87,962.

3 Brandy Woolridge, Brandy with a yes,
4 \$86,600.

5 Amy Yacobacci, last name is
6 Y-A-C-O-B-A-C-C-I, salary at 80,000.

7 Amie Cumming, Amy with I-E, program
8 manager for School Climate Transformation Grant and
9 our digital resource team. She's at 90,000 even.

10 Mimi Gudenrath -- or Miriam, pardon me,
11 Gudenrath. Miriam, M-I-R-I-A-M, Gudenrath,
12 G-U-D-E-N-R-A-T-H, part-time staff member of 43,503.

13 Sandra DeMuth, D-E-M-U-T-H, last name.
14 Her salary is at 42,280.

15 Then our newest hire, Steven Rufe,
16 R-U-F-E, 40,000 even.

17 And we have three vacancies of which we're
18 hiring for.

19 Q I'm sorry, I didn't want to interrupt you.

20 A Sorry. Yes, that's it.

21 Q And what other items are on the line item
22 budget for the GaDOE Georgia tier system of support
23 team? Is there money for training specifically
24 earmarked?

25 A Yeah. We have typically around a \$2

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

113

1 million IDEA, kind of overarching dollars, which we
2 carve out the salaries.

3 Since we've had the School Climate
4 Transformation Grant for five years, we certainly
5 leaned on the climate grant to help conduct
6 trainings, travel expenses to said trainings. Even
7 funding the equipment to be used in those trainings
8 as well.

9 Q And so I know you said you typically have
10 \$2 million in IDEA funds. What is the total amount
11 of money that is used for training, for PBIS
12 training?

13 A Well, I have to look at the percentage
14 that we peeled off for training. Again, we probably
15 use more IDEA dollars that we didn't have in the
16 School Climate Transformation Grant, so we haven't
17 had to lean on some of those dollars. I don't have
18 the exact figures of how much we spent on training,
19 salaries -- excuse me, trainings, which would be
20 expressed as travel expenses typically. Because we
21 don't charge people to participate in training.
22 What we do is we provide free training; we just pay
23 for our travel expenses.

24 We might rent a conference center for
25 training potentially.

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

114

1 I don't have those figures with me.

2 Q Is it the travel expenses and
3 transportation that you say you don't have those
4 figures with you?

5 A I do not.

6 Q What other items are funded under the
7 PBIS, for PBIS and GaDOE?

8 A Other than salaries, travel expenses for
9 training, and possibly equipment, laptops, and the
10 things that would be associated with that.

11 We could fund a serious of books
12 internally for a book study, but that shouldn't be
13 where -- that's it in the nutshell.

14 Q And you don't have the numbers for those
15 expenses?

16 A No, but they are easily retrieved.

17 Q Are there any other school climate
18 programs that are in use in Georgia schools separate
19 from PBIS?

20 A I could be picky, but PBIS is not
21 necessarily a program. It's the framework. But I
22 know what you mean by that.

23 I'm not aware. It could be -- CASEL's
24 framework could be in place, but I don't know. We
25 don't support that framework and I'm even sure how

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
115

1 many schools use it.

2 Q Is that CASEL, spelled like --

3 A C A --

4 Q C-A-S --

5 A C-A-S-E-L, the Consortium for the
6 Association for Social/Emotional Learning.

7 I don't -- again, they're a consortium. I
8 don't know -- we don't mandate it. We don't track
9 it.

10 Q To your knowledge, are there any other
11 frameworks or programs that are used to support
12 school climate other than PBIS and C-A-S-E-L?

13 A Not in I'm aware of.

14 Q You said that GaDOE does not support
15 C-A-S-E-L. Does GaDOE support any other school
16 climate efforts outside of PBIS?

17 A I mean school climate in a broad sense
18 would certainly support the use of student health
19 safety survey we've had in existence for a number of
20 years. But the district would have the data to look
21 at different elements of school climate and Star
22 Climate Rating. But as far as officially having a
23 vehicle to improve climate, that's comprehensive
24 now.

25 Q So is it fair to say GaDOE has not

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

116

1 endorsed the use of any alternative school climate
2 programs?

3 A I'm unaware of a school climate program.

4 Q Has the --

5 A PBIS is a -- I'm sorry.

6 Q Sorry. Go ahead.

7 A No.

8 Q Has the efficacy of school climate tracked
9 for schools who do not implement the PBIS framework?

10 A Well, we certainly use the -- we certainly
11 look at the school climate rating to assess if the
12 school has what their climate is based on on that
13 rating scale. So we look at PBIS schools versus
14 non-PBIS schools. Certainly looked at that in the
15 past.

16 Q When was the --

17 MS. GARDNER: Go ahead.

18 MS. JOHNSON: Can we go off the record
19 real quick so I can switch audios? My phone
20 battery is not going to last much longer.

21 THE VIDEOGRAPHER: We'll go off the record
22 now at 6:42 p.m.

23 (A recess was taken.)

24 THE VIDEOGRAPHER: We are back on the
25 record, 6:43 p.m.

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

117

1 Proceed.

2 BY MS. CHEVRIER:

3 Q Mr. Hill, when was the Office of Whole
4 Child Supports created?

5 A I don't remember the exact month and date,
6 month and year. It started with just one
7 individual, Ashley Harris, and I think it took place
8 before COVID. So I do not know.

9 Q Can you ballpark it? Was it five years?
10 10 years?

11 A Oh, yeah, yeah. It was within -- yes. I
12 can do that.

13 It was in the last -- at least 2020 maybe.
14 Maybe 2020.

15 Q Thank you. Why was it created?

16 A I believe that the Office of Whole Child
17 Supports was initially really created, and it's
18 still part of kind of the mantra, and that is
19 develop an office whose mission was exclusively
20 designed to look at nonacademic barriers to students
21 achieving success.

22 So, for example, are students not
23 achieving success because there's a lack of access
24 to a doctor that might be 30 miles away? So could
25 it be that we could help a school put a school-based

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
118

1 health center onsite with the school so that kids
2 could just go to the doctor right there instead of
3 having to wait weeks and travel 30 miles to see a
4 doctor. So that could be a barrier to a student
5 achieving success.

6 So that would be a function that was
7 developed within this office that's reality. That's
8 just -- that's just one example.

9 Q I'd like to show you what's being marked
10 as Plaintiff's Exhibit 974, and this is a screen
11 capture of the Office of Whole Child Supports, GaDOE
12 website.

13 (WHEREUPON, Plaintiff's Exhibit-974 was
14 marked for identification.)

15 MS. CHEVRIER: My colleague is going to
16 pull that up.

17 BY MS. CHEVRIER:

18 Q Do you recognize this website?

19 A I do.

20 Q Do you see where it says "the divisions
21 located within" -- sorry. You do have access to
22 scroll within this document.

23 Do you see where it says: "The divisions
24 located within the Office of Whole Child Supports
25 include"?

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023

119

1 A I mean on this first paragraph right here?

2 Q Yeah.

3 A Yes.

4 Q Do you see where it says that the first
5 division listed is Georgia Center for School Safety?

6 A I do.

7 Q What is its focus?

8 A This is a, a office that's really
9 brand-new. We only have one person in it, and we're
10 hiring for a manager currently.

11 Typically, what this -- this office team
12 will focus on is for the most part be a liaison with
13 what we call GEMA, which is like FEMA, but just at
14 the State level. So Georgia Emergency Management
15 Homeland Security Agency. And we just try to have a
16 coordinated relationship so that assessing school
17 safety plans is not something that the Georgia
18 Department of Education does, that's something that
19 GEMA does, and that falls with that their authority.

20 However, GEMA -- and I just had a meeting
21 with GEMA not too long ago. What GEMA likes to have
22 is like what is the department's position on certain
23 things and how we communicate together on a number
24 of fronts.

25 But, by and large, also taking grants that

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
120

1 would come down from the Federal Government, maybe
2 even from The Governor's Office, that could help
3 schools shore up their security features.

4 So this liaison office would really help
5 take things like that on.

6 Q And the next division listed is Mental
7 Health and Wellbeing, correct? I'm sorry.

8 Integrated Wellness. Is that correct?

9 A Correct.

10 Q What is its focus?

11 A Well, if you look at my previous example
12 that I've talked about, School-Based Health Centers,
13 that certainly -- the third bullet there, but if you
14 look at School Nurse Exchange. Again, its main
15 focus is are there wellness factors in the health
16 domain that are causing schools and students not to
17 be successful, and this focus is to try to help
18 identify those proactively so that they would
19 achieve success.

20 So, for example, the school nurse
21 representative, we never had a school nurse
22 representative. That person is working to make sure
23 that our Student Information Systems, that they no
24 longer have pen and pencil of recordkeeping for
25 school nursing logs, to make sure it's more

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
121

1 automated so we get a good sense of students that
2 are requesting support, and also that the school
3 nurses that exist out in the field have a voice to
4 help enhance their integration efforts, their
5 professional learning, and things like that.

6 Q The next division stated is Mental Health
7 and Wellbeing correct?

8 A Correct.

9 Q What is its focus?

10 A Well, the mental health and wellbeing
11 aspect, so we have several grants. One of them is
12 Project AWARE, which is a SAMHSA grant. The others
13 would be kind of looking at mental health, awareness
14 training. Its big focus is to help build capacity,
15 build awareness of mental health concerns and
16 challenges across the State, with school
17 professionals, district -- district folks.

18 If the training -- many times this could
19 involve a partnership, since we mentioned acronyms,
20 DBHDD. It could be looking at partnerships with how
21 we deliver something, for example, called Sources of
22 Strength, which is kind of a peer-led resiliency
23 focus on -- it's an upstream prevention on how to
24 identify the risk factors among youth and how to be
25 resilient in the face of problems.

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
122

1 It's just looking at a lot of different
2 factors that would interfere with students being
3 successful. In some cases it's access to healthcare
4 and health pieces. The other could be some mental
5 health concerns and how could we recognize those
6 pieces, as well as some of the other ones listed
7 there.

8 Q The next division listed is Multi-Tiered
9 Supports. Is that correct?

10 A Correct.

11 Q And what is its focus?

12 A That is the focus on most of our
13 conversation today. That is the MTSS academic team
14 and the PBIS behavior team, and those are the
15 activities that exist and that's what we're trying
16 to merge as we speak.

17 Q The next division is listed is School
18 Climate, correct?

19 A Correct.

20 Q What is its focus?

21 A Well, school climate is that destination;
22 we want schools to have a school climate. So we
23 define it, and when we mention school climate, you
24 know, what are the components of school climate, how
25 do we assess and look at it. Really, the

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
123

1 Multi-Tiered Supports bullet above that would
2 certainly be the framework in which to address most
3 of it.

4 Q We've gotten to my next question. Are the
5 Multi-Tiered Supports division and the School
6 Climate division separate, or how do they overlap?

7 A Think of it, think of it as three braids:
8 Is we're looking at school climate, behavior, and
9 academics. The three braids all united and twisted
10 together.

11 The web page is not great because we're
12 meeting on Wednesday to redo our webpage so it's a
13 little clearer. I inherited a webpage, and
14 Wednesday it's an all-day whiteboard session to make
15 it clearer.

16 Q What in addition to PBIS does the School
17 Climate Team focus on?

18 A The School Climate Team would -- could
19 focus on integrating the other pieces that were
20 mentioned above. It's multi-tiered kind of team is
21 really the conduit for all the other pieces of Whole
22 Child.

23 So if every school team has a prevention
24 base team at the school, there's more factors to
25 look at other than office discipline referrals. So

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
124

1 we certainly want to see that school-based team
2 being a great liaison to say what are the other
3 factors that are causing students to not be
4 successful, and could, through this tiered support
5 structure, could we look at social workers, could we
6 look at student-based health centers, could we look
7 at mental health awareness, how do we grow and
8 expand the things that we're looking at. It's not
9 overwhelming but it becomes organic.

10 Q What is the reporting structure for the
11 School Climate Team?

12 A The School Climate Team is really now the
13 Tiered Supports Team, but it's -- for our
14 conversation today, you could just say they report
15 to Jeannie Morris, and Jeannie Morris reports to me.

16 Q Is it accurate to say that Jeannie Morris'
17 current title was previously the PBIS program
18 manager?

19 A That's correct. Well, I would say -- hold
20 on.

21 I would say she's a school climate
22 official in the books, school climate manager, but
23 for the sake of this, if it's easier to understand,
24 she's the PBIS manager. That's fine, too. But she
25 was the school climate program manager, of which

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
125

1 PBIS was the largest focus area.

2 Q And with the name change, was this
3 position restructured at all?

4 A No. I was just trying to speak to the
5 reality. Again, school climate is the destination,
6 and PBIS is the vehicle to get to the destination.
7 But it didn't change the nature of the work.

8 Q Who made the decision to remove PBIS from
9 the position title?

10 A Officially removed it? I don't know. I
11 think we all kind of talked about what it could be
12 referred to. It was the PBIS program manager
13 position when it was under the School Safety And
14 climate. When it was moved under the Office of
15 Teaching and Learning with Dr. Caitlin Dooley as the
16 deputy superintendent, I know that she and I talked
17 about it. She may have had her own conversations
18 with the chief of staff, but we certainly looked at
19 what's a more accurate way and a broad-based way to
20 call the manager, because people get hung up on an
21 acronym, well, what's PBIS manager? Well, they seem
22 to have less issues if you say the school climate
23 manager. They seem to kind of intrinsically have an
24 understanding of what it means.

25 Q Is it fair to say that there was a shift

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
126

1 away from specifically mentioning PBIS in division
2 or title names?

3 A There was a -- I think a lot of it had to
4 do with the fact that when I say PBIS to the average
5 citizen, the answer is, now, what's that again? But
6 if I say this is school climate manager, oh, I think
7 I understand what that means.

8 Q If you continue to scroll down on the
9 document, please, is it correct that the next
10 division listed is School Safety?

11 A I see that.

12 Q And what is its focus?

13 A Well, the School Safety should really be
14 back up top where it also says School Safety. So
15 it's the same focus.

16 Q So the School Safety listed here is the
17 same focus as the Georgia Center for Safety -- for
18 School Safety that's listed above?

19 A Yeah. Again, it's looking at all the
20 things that would cause the school to be unsafe, and
21 that's part of Wednesday's activities, is to take
22 the website and make it easier to access and to
23 understand and that it logically flows a little
24 better.

25 Q Do you see below where it says "Additional

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
127

1 Whole Child Support Activities"?

2 A I do.

3 Q Do you see where it says "Whole Child
4 Model School Certification (coming soon)"?

5 A I do.

6 Q What is the Whole Child Model School
7 Certification?

8 A The Whole Child Model School Certification
9 is looking at a way to look at the tenets of Whole
10 Child education, to make sure that -- it's kind of
11 where the research field is -- is, is looking at not
12 just -- not just behavior and not just academics,
13 but looking at the whole child, which would include
14 even the mental health pieces, even the health areas
15 that we talked about, and then could we create a
16 certification that is happening nationally that
17 could say, this school has put all the pieces
18 together, they have the health focus, students that
19 are just not in math, English language, Arts
20 Science, Social Studies, but also an arts education,
21 that they provide a whole focus on the child, and at
22 the same location.

23 So it's much more comprehensive way to
24 look at it, but certification is not that easy. So
25 we have three districts participating in the

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
128

1 process, Clarke County schools, which we have a
2 couple of schools there, one or two in Cobb County,
3 and then a couple in Forsyth County, Georgia, that
4 are participating with some of that.

5 Q And when will the Whole Child Model School
6 Certification go into effect?

7 A I just think we need to update the web
8 page, but it's offered through an outside group that
9 helps assess fidelity. Again, it's one of the --
10 Wednesday's activities are determining the high
11 propensity to be linked. So --

12 Q Have any -- sorry.

13 A Hopefully we'll have that in the next
14 couple of months.

15 Q Have any schools been awarded the Whole
16 Child Model School Certification yet?

17 A I think so. But I'd have to -- I'd have
18 to verify that they received an official
19 certification.

20 Q Have there been any schools that have been
21 deemed worthy of the certification but may not have
22 received it formally yet?

23 A I've heard there are a couple that I
24 should visit, but it's a small list, not a large
25 list. Like I could fit them on my hand.

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
129

1 Q Thank you. Do you see where it says
2 "Wraparound Support Services (Coming soon)"?

3 A I do.

4 Q What Wraparound Support Services is this
5 referring?

6 A Through the funding stream that has been
7 provided to the Office of School and District
8 Effectiveness, which many states would call their
9 School Improvement Division.

10 They just set aside funding for .5 FTE at
11 the RESAs. So each of the 16 RESAs have .5 FTE.

12 That part-time employee, who at some times
13 is the school climate specialist on the other half
14 of their day, their job is to participate in helping
15 federally identifiable schools on the needs
16 improvement list, look at the nonacademic factors
17 that could be contributing to a school not getting
18 on those lists, not succeeding.

19 So we have a staff member whose job is to
20 provide monthly trainings to these half-time
21 employees, on how they could better work with the
22 school improvement process to help schools succeed,
23 because prior to that most of these school
24 improvement processes, in most states, have almost
25 an exclusively academics focus, whereas they're

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
130

1 looking at, well, maybe the academics focus should
2 be broadened, and they help provide that broadening.

3 Q When will the Wraparound Support Services
4 go into effect?

5 A It is in effect. Why it says coming soon
6 is something I'll remedy sooner than later.

7 Q Does the Office of Whole Child Supports
8 ever coordinate with the Georgia Department of
9 Behavioral Health and Developmental Disabilities?

10 MS. JOHNSON: Object to form.

11 You can answer.

12 A We do.

13 Q In what ways?

14 A To give you a very tangible example,
15 previously I mentioned something called Sources of
16 Strength, an upstream prevention program. And the
17 DBHDD provides the training but the DOE also has
18 some trainings. So one of the things that we do is
19 once the school district wants the training, they're
20 likely to reach out to us versus DBHDD, but we have
21 limited capacity. But they have some capacity, but
22 together I think we have more capacity than
23 separate.

24 So what we've done is started to work
25 together to coordinate who needs training, and how

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
131

1 do we divvy up that help so that we can give all the
2 schools the proactive help that they can use.

3 Q How frequently would you say that the
4 Office of Whole Child Supports coordinates with
5 DBHDD?

6 A I would say since -- I don't know I'd see
7 that's always been quarterly, but here recently it
8 is at least quarterly, especially since -- not that
9 COVID has gone away, but we're more or less on the
10 right side of it, that I would say it's become a
11 little more routine, and I've participated in at
12 least one of those discussions.

13 Q With whom from DBHDD does the Office of
14 Whole Child Supports coordinate?

15 A Mostly through Dante McKay. I believe his
16 official title is director. I don't have his -- the
17 rest of his title. I'd have to look it up.

18 Q Does the coordination with DBHDD ever
19 concern the GNETS program?

20 MS. JOHNSON: Object to form.

21 A Not to my knowledge.

22 Q Mr. Hill, at the beginning of our
23 discussion today you said you had a couple of memos
24 and other documents that you brought with you today.
25 Is that correct?

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
132

1 A Sure. I did.

2 Q Can you read the title of the different
3 memos that you have with you today?

4 A One is the salary memo, which Stacey has.
5 It doesn't have a title, just salary memo,
6 but it has all the things that I read off.

7 MS. CHEVRIER: I'd like the salary memo
8 to -- that we will mark it as Plaintiff's
9 Exhibit 975.

10 (WHEREUPON, Plaintiff's Exhibit-975 was
11 marked for identification.)

12 A The other one doesn't have a specific
13 title but it certainly has the PBIS schools that
14 have been trained. You asked a series of questions
15 about how many schools have been trained, Tier I,
16 Tier II, and in classroom, and then you asked about
17 SWIS. So I put all of that on one memo.

18 MS. CHEVRIER: And we will plan to mark
19 that as Plaintiff's Exhibit 976.

20 (WHEREUPON, Plaintiff's Exhibit-976 was
21 marked for identification.)

22 MS. JOHNSON: I need to send them to you
23 so we can mark them.

24 MR. HOLKINS: Excellent. Thank you.

25 BY MS. CHEVRIER:

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
133

1 Q And other than those two memos, is there
2 anything else you brought with you today, Mr. Hill?

3 A One more. It's called the -- it's short,
4 the PBIS levels of school recognition for the
5 2022-2023 school year.

6 MS. CHEVRIER: And we will plan to mark
7 that as Plaintiff's Exhibit 9 -- sorry. That's
8 977. Thank you.

9 (WHEREUPON, Plaintiff's Exhibit-977 was
10 marked for identification.)

11 A I can send it to you again.

12 Q And were there any other documents other
13 than those three you brought with you today?

14 A No.

15 MS. JOHNSON: Two of them I can send to
16 you right now and we just have to locate where
17 the third one is but we'll get that to you,
18 too.

19 MS. CHEVRIER: Excellent. Thank you so
20 much.

21 I ask that we get it as soon as possible
22 so we're able to submit it with the other
23 exhibits for the court reporter.

24 MS. JOHNSON: We're going to send that one
25 out to you.

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
134

1 Do you want to go off the record for like
2 two minutes while we do this, or do you want to
3 -- it's up to you.

4 MS. CHEVRIER: I think those are all the
5 questions we have today, so I think we can go
6 ahead and end at our end.

7 MS. JOHNSON: Okay. I don't have I
8 questions either. I just want to be sure that
9 these come through before we, before we go off
10 the record, just to be sure.

11 I've got all three and I will send them to
12 you now, and, yeah, we don't have any further
13 questions.

14 THE VIDEOGRAPHER: If there's nothing else
15 for today's record, we will now go off the
16 record at 7:07 p.m.

17 (Whereupon, the deposition concluded at
18 7:07 p.m.)
19
20
21
22
23
24
25

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
135

C E R T I F I C A T E

STATE OF GEORGIA:

FULTON COUNTY:

I hereby certify that the foregoing transcript of JUSTIN HILL 30(b)(6) was taken down, as stated in the caption, and the questions and answers thereto were reduced by stenographic means under my direction;

That the foregoing Pages 1 through 134 represent a true and correct transcript of the evidence given upon said hearing;

And I further certify that I am not of kin or counsel to the parties in this case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case.

IN WITNESS WHEREOF, I have hereunto subscribed my name this 15th day of March, 2023.

Wanda L. Robinson

Wanda L. Robinson, CRR, CCR No. B-1973
My Commission Expires 10/11/2023

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
136

D I S C L O S U R E

STATE OF GEORGIA) 3/06/23 VIDEOTAPE DEPOSITION OF
FULTON COUNTY) JUSTIN HILL 30(b)(6)

Pursuant to Article 10.B of the Rules and
Regulations of the Board of Court Reporting
of the Judicial Council of Georgia, I make the
following disclosure:

I am a Georgia certified court reporter.
I am here as a representative of Esquire Deposition
Solutions, LLC, and Esquire Deposition Solutions,
LLC was contacted by the offices of U.S. Attorney's
Office to provide court reporter services for this
deposition. Esquire Deposition Solutions, LLC will
not be taking this deposition under any contract
that is prohibited by O.C.G.A. 9-11-28 (c).

Esquire Deposition Solutions, LLC has no
contract/agreement to provide court reporter
services with any party to the case, or any counsel
in the case, or any reporter or reporting agency
from whom a referral might have been made to cover
this deposition.

Esquire Deposition Solutions, LLC will
charge the usual and customary rates to all parties
in the case, and a financial discount will not be
given to any party to this litigation.



25

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
138

CERTIFICATE OF DEPONENT

I hereby certify that I have read and examined the foregoing transcript, and the same is a true and accurate record of the testimony given by me. Any additions or corrections that I feel are necessary, I will attach on a separate sheet of paper to the original transcript.

Signature of Deponent

I hereby certify that the individual representing himself/herself to be the above-named individual, appeared before me this _____ day of _____, 2023. and executed the above certificate in my presence.

NOTARY PUBLIC

MY COMMISSION EXPIRES:

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
Index: \$2..250

	9367125 Jus	29:19		56:17
Exhibits	tin.Hill.	1,400	2	57:6
	EXHIBIT976	35:22		63:10
9367125 Jus	4:19	36:21	2	65:19
tin.	132:19,20		75:8	69:6,10
Hill PREVIO	9367125 Jus	1,419		117:13,14
USLY MARKED	tin.Hill.	36:25	2000	2021
.EXHIBIT965	EXHIBIT977	37:6	35:22	54:8
4:25	4:20	94:7,12	2006	56:17
11:13,20	133:9	1,500	18:21	57:6
9367125 Jus		35:24	28:7,20,	63:10
tin.Hill.		36:22,24	23	2022
EXHIBIT970	\$	37:6	2007	14:1
4:8 26:22	\$2	94:14	27:17	106:9
27:2	112:25	1-16-CV	28:3,21,	2022-2023
9367125 Jus	113:10	5:7	25	133:5
tin.Hill.	\$80,000	10	2008	2023
EXHIBIT971	112:1	92:17	13:3	5:2 11:16
4:9	\$86,600	117:10	28:25	2024
52:15,18	112:4	13	2014	26:23
69:17	\$87,619	63:11	26:23	27:9
9367125 Jus	111:24	14	27:9	21
tin.Hill.	\$87,962	12:13,18,	2015	35:22
EXHIBIT972	112:2	22 63:11	16:4	92:14
4:11	\$89,621	15	2017	21-22
69:19	111:20	12:13	52:22	37:10
9367125 Jus	\$90,729	20:16	53:12,20,	79:10
tin.Hill.	111:22	15th	25 69:24	94:7,12
EXHIBIT973	\$98,000	13:24	70:8 99:7	21st
4:13	111:8	14:1	2018	69:24
99:2,4		106:9	53:12,25	70:8
9367125 Jus		16	54:2 58:7	22
tin.Hill.		12:13	2019	35:22
EXHIBIT974	0	32:2	54:3,5,12	60:14
4:16	03088	129:11	55:25	92:14
118:10,13	5:7	17	105:24	22nd
9367125 Jus		12:14,18,	2019-2020	52:22
tin.Hill.		23 53:13	55:11	24
EXHIBIT975	1	1st	2020	10:9
4:18		11:16	53:17	250
132:9,10	1		54:5,7,12	76:16
	24:25		55:25	

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
Index: 3..accurately

79:10	441		973	61:8
	92:14,16	7	99:2	64:15
3	4:03		974	81:7,19,
	5:3	70	118:10	22
3		69:4		107:18,25
53:7	5	88:22	975	108:4
65:15		70%	132:9	123:9
71:16	5	53:15	976	127:12
75:8	31:25	65:17	132:19	129:25
30	53:16	7:07	977	130:1
32:25	64:8	134:16,18	133:8	accept
44:6	65:18		A	53:23
110:12	129:10,11	8		acceptance
117:24	50		ability	66:6
118:3	84:21	80	7:21 9:16	access
30(b) (6)	50%	24:24	41:1	11:23
5:5 6:4	71:14	25:10	42:12,13	22:12
11:15	5:55	95:25	43:13	27:5
12:3,12	90:14	80,000	51:10,12,	68:4,10,
	5th	112:6	14 73:7	12,18
4	99:7	80s	74:5 75:3	97:7
		65:6	Absolutely	117:23
4			75:14	118:21
27:14,15	6	9	82:18	122:3
53:16			absorb	126:22
65:18	6	9	73:7,19	accident
40	5:2	133:7	75:3	96:2
14:5	60	90,000	academic	accidental
40,000	35:19,25	112:9	13:18	64:20
112:16	87:14	90s	16:12	accompanied
400	60s	65:6	24:9	5:20
37:9	24:4	965	32:13	accurate
403	6:03	11:13	45:22	21:4
37:9	90:22	970	61:1,16,	22:11
419	6:42	26:22	21 74:8	28:19,25
35:22	116:22	971	79:22	49:12,17,
42,280	6:43	52:15	80:10,19	20 62:4
112:14	116:25	69:17	82:1	78:20,24
43,503		972	106:18	124:16
112:12		69:18	107:15	125:19
			122:13	accurately
			academics	7:14

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
Index: achieve..appropriately

achieve	add	affect	111:14,18	75:16
30:21	9:6 74:7	73:21	116:6,17	answering
69:8,13	89:3,5	affecting	134:6	8:2,22
81:21	108:8	7:21	Alabama	answers
86:17	adding	afternoon	33:16	7:10,14
120:19	61:3	6:10	44:4	Anthony
achieved	80:18	Agencies	align	111:21
55:25	addition	32:2	57:3	anymore
57:2,6,20	21:20	agency	all-day	48:6
58:16,22	22:14,20	100:3	123:14	Appears
59:1,5	62:22	119:15	Allison	52:24
69:6,9	82:7	agency's	5:22	appetite
98:22	94:15	100:6	alternative	59:16
achieving	123:16	aggressive	101:12	applicable
13:20	additional	56:25	116:1	35:8,13
69:5	9:4 25:4,	agree	Amber	application
117:21,23	17 31:20	26:17,20	111:25	s
118:5	41:11,14	agreement	America	62:23
acronym	43:7	75:23	5:6	apply
125:21	45:14	76:2	Amie	98:7
acronyms	49:9	agreements	112:7	appointed
9:22	55:13,14	24:14	amount	104:18
121:19	90:4	31:4	47:4	approach
act	97:16	35:20	74:10	18:9 24:2
61:8	126:25	agrees	102:15	28:12,15,
actively	address	36:4	110:23	18 31:21
62:13	27:22	ahead	113:10	34:24
80:3	29:6	8:16	Amy	36:19,22
92:18	adheres	14:9,10	112:5,7	56:3 65:9
activities	26:13	18:5 21:7	analysis	76:10
15:5	adjust	22:9	29:5	80:8
17:13	80:18	26:15	analyze	107:16
57:17	adoption	38:3	41:1,10	approached
84:24	34:12	47:19	42:13,16	54:16
122:15	adult	49:6	43:12	approaches
126:21	24:6	50:13,23	51:10	76:5 85:2
127:1	advanced	58:4	analyzing	approaching
128:10	37:17	60:17	68:21,23	37:6
activity	59:15	68:22	87:2	appropriate
57:24	advisor	86:21	anecdotal	ly
adapt	54:23	93:20		
78:2		102:1		

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
Index: approximately..base

43:17	34:16	assist	32:16	50:18
approximate	Assembly	67:20	attend	59:8
ly	110:15	76:13	34:8 80:6	114:23
35:25	assess	assistance	attendance	115:13
apps	40:25	27:21	66:22,25	121:12
52:7	41:7	28:6,14	68:6,12,	awareness
62:23	42:11	29:20	19,20,25	121:13,15
April	51:14	54:22	104:11	124:7
53:9	58:24	73:20	attending	
arbitrarily	65:24	83:2	66:22	B
89:16	68:7,13	assistant	attorney	back
area	82:20	14:18	6:13,22	18:10
39:13	86:3 87:9	30:3	8:11	44:6
75:15	88:4,19	70:22	attrition	90:21
79:18	94:3	assistants	103:20	116:24
125:1	101:5,9	29:24	audios	126:14
areas	103:9	associate	116:19	background
13:1,16	116:11	13:10	authentic	16:5,7,14
14:24	122:25	Association	71:6	bad
30:18	128:9	115:6	authority	33:17
45:23	assessed	assume	119:19	balance
66:13	51:20	23:25	automated	87:11
76:9 77:1	52:2	64:15	93:2	balanced
98:15	86:13	assumption	121:1	94:22
102:20	98:9	45:1,5	availabilit	107:24
104:8	assessing	assumptions	y	ballpark
108:4	56:21	45:2	78:6	117:9
127:14	69:1 88:8	Atlanta	average	banning
argument	89:20	5:9	109:14	86:17
25:21	119:16	attached	126:4	barrier
45:13	assessment	29:23	avoid	118:4
47:7	26:20	104:13	7:24	barriers
arts	44:15	attachment	102:17	13:14,19
127:19,20	48:18	11:17	awarded	117:20
Ash	63:1,5	12:13,17	128:15	Barrow
19:11	87:12	53:3,6	aware	111:19
Ashley	88:1,2,6	63:11	18:18,22	base
117:7	93:15	65:16	35:16	106:19
aspect	94:20,22	attempt	47:18,20	111:7
121:11	Assessments	18:2	49:16	123:24
assembled	62:11	attempting		
	assigned			
	108:20			

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
Index: based..calculate

based	behaving	107:18	73:23	105:1
26:3	45:25			108:16
38:11,16	behavior	behoove	Brandy	109:9
39:6	10:16	82:7	112:3	121:14,15
54:10	24:6,10,	belief	break	building
55:9	21,23	64:25	8:19,23	31:20
56:15	25:1	benchmarks	breakdown	32:4
57:4	27:20	86:10,13	22:18	64:12
71:20	28:8	Benjamin	109:12	75:24
77:11	31:19	111:23	bring	108:21
85:22	32:12	big	69:14	109:2
116:12	39:4,11,	15:5,6	70:1	built
basic	16 40:8	74:6	109:8	76:25
24:11	44:19	121:14	broad	bullet
basically	48:17,18	biggest	115:17	120:13
6:23	52:12	58:22	broad-based	123:1
92:23	60:24	79:20	125:19	burn-outs
basis	61:8,11,	bit	broadened	73:11
12:25	16,21	25:17	130:2	business
Bates	62:10	87:6	broadening	61:19
52:16	63:23	88:3,10	130:2	106:25
69:22	64:18,20,	98:7	brought	
70:2 99:2	22 65:13	101:11	131:24	C
battery	74:6 76:3	body	133:2,13	
116:20	80:9	72:6	budget	C-A-S
began	81:13,23	book	22:16	115:4
28:3,20	96:2	114:12	110:15	C-A-S-E-L
38:8	107:13,24	books	112:22	115:5,12,
begin	108:4	114:11	build	15
71:17	122:14	124:22	16:18	cabinet
72:16	123:8	booster	17:14	30:20
84:3	127:12	103:17,25	24:5	cadre
beginning	behavioral	104:4	31:19	30:4
46:5 55:2	11:9	bottom	34:19	34:17
63:20	23:15	75:5	36:17	47:1
72:22	27:22	braids	41:12	64:10
77:12	29:4,12	123:7,9	49:9	Caitlin
91:1	130:9	brand-new	51:15	125:15
131:22	behaviors	34:20	54:13,19	calculate
begins	23:24,25	119:9	64:7	96:21
5:4 53:7	24:17,19	Brandi	75:23	102:13
58:24	25:18		76:8	
76:15	26:18		83:13	
	45:23			
	46:1 67:8			

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
Index: calculating..Civil

calculating	32:4	category	36:19	111:12
37:10	34:19	98:22	63:23	117:2
calculation	40:15,18	causing	64:2,17	118:15,17
95:19	41:10,14,	104:9	65:4	132:7,18,
calculator	16 49:9	120:16	71:18	25 133:6,
110:25	51:8,9,15	124:3	72:23	19 134:4
call	52:4	cautious	73:2,22	chief
20:15,21	54:14,18,	95:14	74:10	14:3
25:4 98:5	20 56:9	cc'ed	75:3	74:23
102:24	64:7,11	99:20	76:3,4	83:12,13
103:16	71:13	center	78:12	125:18
108:2	74:25	28:6,14	79:4	child
119:13	76:8,25	29:21	102:15	13:11,23
125:20	78:15	30:3	125:2,7	14:6
129:8	83:4,13	113:24	changed	15:17
called	86:20,22	118:1	73:13	32:12
13:17	105:1	119:5	102:8	42:5
19:4	108:6,21	126:17	changing	48:8,11
40:23	121:14	centers	89:16	49:19
52:7	130:21,22	14:13	93:5	61:10
62:22	capture	15:3	102:18	90:7
63:2 81:6	7:14	73:15,20	charge	105:7,12
87:12	118:11	120:12	113:21	106:8
108:2	care	124:6	charity	107:5
121:21	81:15	certificati	44:21	108:6
130:15	career	on	checking	117:4,16
133:3	62:12	16:3	111:9	118:11,24
calling	carve	127:4,7,	checkups	123:22
59:14	113:2	8,16,24	85:18	127:1,3,
calls	case	128:6,16,	Chevrier	6,8,10,
98:4	5:7 44:6	19,21	5:18 6:9,	13,21
campaign	67:21	challenges	12 11:18,	128:5,16
32:4	CASEL	121:16	22 22:9,	130:7
capabilitie	115:2	challenging	13 26:25	131:4,14
s	CASEL's	26:18	27:4	chime
91:24	114:23	chance	52:20	17:19
capable	cases	24:17	69:21,25	chooses
51:21	29:3	111:16	70:4,6	91:14,19
capacity	122:3	change	71:24	circles
17:15	categorizat	16:8	72:1,3,7,	61:16,17
23:17	ion	24:7,23	11 90:12,	citizen
31:21	98:17	35:1,3	20,24	126:5
			99:6	Civil
			109:21	6:14

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
Index: Claire..concluded

Claire	10,14,17,	78:12	45:9,20	comprehensi
5:18 6:12	18,20,24	82:24	collection	ve
109:19	68:2,3,7,	83:1,5	92:24	28:12,18,
clarify	14 69:2,	84:21	College	24 31:23
8:9	5,11 74:6	87:21	16:1	32:22
Clarke	76:13,22	coaches	combination	33:7
128:1	79:1	29:23	104:23	43:13
classroom	82:24	64:6	combined	56:6
45:25	83:14	coaching	60:19,22	61:10
71:16	84:12,17,	16:19	61:20	86:19
73:25	19 89:18	31:13	common	115:23
75:7,10,	102:23	35:4	26:4	127:23
21 76:4,	104:17,25	36:16	44:22	comprehensi
19 77:8	105:17,23	42:14	communicate	vely
78:8 79:5	106:3	49:1 55:3	85:4,11	29:25
83:22	107:13	58:20,25	119:23	54:21
88:9 96:6	110:11,20	64:11	communicati	computer
101:2	112:8	76:12	ng	7:18
108:16	113:3,5,	82:19	8:1	concentrati
132:16	16 114:17	84:7 85:2	community	on
classrooms	115:12,	88:21	66:20	concept
24:9 65:8	16,17,21,	Cobb	completed	concepts
76:17	22,23	77:2	38:7	73:5
78:21	116:1,3,	128:2	59:22	concern
clearer	8,11,12	codes	60:20,23,	74:13,21,
123:13,15	122:18,	31:8	24	25 75:4
Cleveland	21,22,23,	cohort	completely	131:19
99:9,21,	24 123:6,	56:3	7:1 9:2	concerns
22	8,17,18	60:13	completing	9:14
climate	124:11,	cohorts	41:15	74:24
25:24,25	12,21,22,	30:25	compliance	121:15
26:1,5	25 125:5,	colleague	25:10	122:5
29:13,18	14,22	11:18	components	concert
30:14	126:6	27:1	30:20	34:19
31:6,25	129:13	69:25	98:14	38:9
34:18	close	118:15	122:24	conclude
53:16	91:25	colleagues	comprehensi	43:25
57:11	co-counsel	5:15,20	bly	concluded
62:7,15	5:24	collect	29:21	37:16
65:18,21,	co-director	21:18		134:17
22,24	30:1	92:1 93:2		
66:1,3,	coach	collecting		
13,17,18,	31:16			
20 67:3,	54:18			
	77:4			

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
Index: concrete..court

concrete	constantly	conversatio	105:1	91:21
79:16	102:18	n		93:12
84:2	consult	6:24 20:6	copied	99:25
conduct	89:3	61:18	70:11,20	101:20
16:9 31:9	consultant	101:4,10	99:10	105:10
59:20	19:2	122:13	copies	120:7,8,9
113:5	contact	124:14	22:14	121:7,8
conducts	97:10,14	conversatio	copy	122:9,10,
105:4	contained	ns	95:2	18,19
conduit	96:17	85:6	core	124:19
123:21	context	125:17	107:19	126:9
conference	24:19	convince	cornerstone	131:25
113:24	80:3	31:24	86:8	corrections
confirm	contextual	coordinate	corporal	89:24
9:23 27:8	24:22	130:8,25	96:8	counsel
70:2	continue	131:14	corporate	5:14 8:15
99:8,12,	48:10	coordinated	6:1	15:20
17	63:6	119:16	correct	20:2,21,
conjunction	92:16,18	coordinates	12:15,21,	25
82:25	109:25	131:4	24 14:1	count
102:22	126:8	coordinatin	15:17,18	94:10
104:18	continuous	g	19:20	counties
Connecticut	43:14	76:11	20:12	35:17
17:6	continuum	coordinatio	27:10	country
73:24	29:3	n	29:9	89:2
connection	contracted	131:18	36:20,24	105:19
19:14,17	56:10	coordinator	38:13,16	County
considerati	contributin	47:8	39:7,9	56:13
on	g	82:25	40:5	77:2
39:15	129:17	84:20	41:17,24	128:1,2,3
considerati	control	96:19	42:8 43:1	couple
ons	65:15	97:9	48:9,12	12:7
61:1 97:1	71:23	102:23	52:23	30:25
considered	99:15	104:19	53:1,4,	34:25
62:20	convene	coordinator	11,15,18,	35:2
96:4	45:18,20	s	21,23,25	37:11
consistentl	46:10	31:18	54:1,4,9,	77:2
y	convened	34:21	13 55:12	86:24
96:14	47:24	76:25	59:13,14,	128:2,3,
consortium		79:1	21 63:13,	14,23
115:5,7		83:14,21	14 70:9,	131:23
		84:12	10,12,13	court
		89:19	71:20	5:8,11,16
			75:9	

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
Index: COVID..Demuth

7:4,6,7, 11,13 11:14 16:25 17:17 19:13,15, 16 43:20 44:2,6 63:3,7 90:9 95:10,13 109:19 133:23	credentials 108:23 Crimmins 37:21 38:5 criteria 93:4 98:10 100:11 102:10 Cumming 112:7	38:4 Danielle 5:25 Dante 131:15 data 21:4 24:1 25:8 29:5 31:6,7 33:22 42:13 44:14,15 45:9,21 46:21 66:6 68:19 69:14 91:8,11, 15,21,23 92:1,4,9, 12 93:2, 11,13,16, 22 94:4, 16 95:15 96:3,15, 18,20 97:4,25 98:1,9 102:19 103:4,9, 11 106:24 115:20	daunting 74:9 day 19:7 80:6 84:18 100:15 129:14 days 12:7 35:1 59:16 77:12,14 78:17 80:6 DBHDD 11:8 121:20 130:17,20 131:5,13, 18 death 102:17 Deborah 70:14,15, 19,23 decade 65:6 decades 64:1 65:1,2 December 99:7 decided 28:11 29:11 decision 106:25 125:8 decisions 91:9 102:12 decreasing	26:18 dedicated 31:6,11 32:25 deemed 128:21 deep 76:16 104:10 defendant 23:9 define 24:17 61:8 122:23 defining 98:11 definitions 9:22 98:3,6,7 degree 24:1 degrees 108:25 deliver 32:14 34:17 38:8 76:23 80:8 95:5 121:21 delivered 38:4 demand 79:17 demonstrati ng 45:23 46:1 Demuth
COVID 56:7 57:15 69:10,12 75:4,16 84:16 106:5 108:18 117:8 131:9	current 13:7,8,10 15:7,11 16:6 33:6 79:20 80:4 124:17 curriculum 16:11 37:17 38:8 49:8 55:2 56:19 57:13 58:19 59:1,6 60:10 61:15 76:12 84:6 95:4 105:14 106:1	database 94:1 date 16:2 105:25 117:5 dated 52:21 69:23 70:8 dates 94:23		
crack 80:18				
create 18:2 25:14 41:6 44:21 63:22 89:17 107:23 127:15				
created 63:12 67:15 84:11 117:4,15, 17	D D-E-M-U-T-H 112:13			
creating 90:2	dangerous 96:14			
creation 63:16	Daniel 37:21			

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
Index: Demuth's..district

61:23	designated	86:11	directors	discretionary
99:9	49:25	118:7	34:7	110:14
112:13	designed	developing	109:4	
Demuth's	117:20	37:16	disabilitie	discussed
62:5	designees	76:11	s	97:24
denying	34:7	development	11:10	103:14
67:9	desire	56:18	26:9,11,	discussion
Department	43:12	Development	19 27:25	90:11,16
6:2,15	57:16	al	49:21	91:13
10:2 11:9	destination	11:10	50:17	109:20
27:18	26:5	130:9	130:9	131:23
29:11	122:21	dictates	disability	discussions
48:16	125:5,6	18:3	45:15	131:12
65:23	detail	difference	disagrees	dish
81:7 82:1	93:7	38:20	87:20,24,	89:1
119:18	determinati	71:9 72:8	25	displaying
130:8	on	differently	disassemble	24:9
department's	39:17	80:2	d	disproporti
119:22	determine	difficult	disciplinary	onality
depends	42:20	7:25	y	72:20
104:24	51:17,20	difficultie	27:23	disproporti
deposed	52:3	s	discipline	onate
23:4	67:13	74:8	10:19	27:24
deposition	68:1	digital	31:7	distinguish
5:4,13	89:14	108:15,17	63:24	ed
6:17	102:20	112:9	64:23	96:5,11
11:14,16	determined	direct	65:12	98:14,19
12:3,12	41:11	14:16,17	71:17	100:9
19:22,25	88:15	direction	72:15	distributio
20:3,17,	determining	55:6	73:8	ns
22 21:1	128:10	58:17	93:13,22	84:15
23:2	develop	59:4	94:15	district
134:17	55:1	directly	98:4,5	5:8,9
deputy	71:15	17:13	101:7	30:17
70:16,24	72:14	director	123:25	31:5,12,
100:4,5	85:24	14:18	disciplined	18 32:4
125:16	103:25	18:25	54:17	34:20
describe	117:19	57:12	disciplines	35:5
14:24	developed	70:17,22,	92:10	36:4,6,15
24:11	65:23	25 105:14	discovered	51:14
44:10	81:10	131:16	29:2	58:23
	82:2			62:14

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
Index: district's..email

76:24	120:6	double-	easy	44:13
79:1	121:6	check	127:24	87:5
82:25	122:8,17	12:17	EBIS	effect
83:13,20	123:5,6	draft	19:4	128:6
84:7,11,	126:1,10	38:7	Ed.s.	130:4,5
19 89:19	129:9	52:25	15:24,25	effective
94:3	divisions	53:3	education	33:2
96:19	118:20,23	54:10	6:2 10:2	51:15
97:9	divvy	55:9 57:4	15:23	Effectivene
102:23	131:1	drill	16:5,7,	ss
104:19	doctor	91:23	12,14,20	129:8
109:3	117:24	drive	17:15,25	efficacy
115:20	118:2,4	79:4	18:16	86:3
121:17	document	duly	22:19	116:8
129:7	11:24	6:5	27:18,19	efficient
130:19	12:2		29:11	32:23
district's	27:6,12	E	34:5	33:2
30:23	53:15		40:10	59:17,19
districts	81:6	earlier	42:4 45:3	60:19
31:5	111:10,13	9:5,7	47:8	61:18
35:17,20	118:22	40:3	48:15	effort
36:1,8	126:9	80:21	49:2,16	83:21
46:18	documented	92:22	50:1,6,7,	efforts
56:2,14	80:12	103:14	19 51:6	104:19
71:15	documents	105:8	57:10,11	115:16
72:14	20:24,25	early	62:12	121:4
73:3	21:2,14,	30:22	65:23	eighties
75:17	23 131:24	86:9	70:18,23	109:14
78:7 80:5	133:12	87:12	72:24	110:5
103:15	DOE	earmarked	81:8 82:2	elements
108:22	18:20	112:24	96:24	14:6 91:8
127:25	30:15,16	earn	97:5,17	93:1,13
dive	130:17	110:2	99:23	96:7
76:16	dollars	easier	105:18,22	115:21
104:10	110:14,	75:22	111:19,	ELR
division	16,17	124:23	21,23,25	5:7
5:9 6:14	113:1,15,	126:22	119:18	email
27:18	17	easily	127:10,20	52:16,21
40:11	domain	114:16	educational	53:19
42:4	120:16	Eastern	6:13 10:6	69:23
57:24	Dooley	5:3	16:8 32:1	70:7
66:4	125:15		educator's	71:3,6
90:2,3,6			educators	
99:23				
119:5				

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
Index: Emergency..expectation

72:6 75:6	enhance	114:9	117:5	27:2
84:15	121:4	equitable	EXAMINATION	Exhibit-971
99:7,9, 13,18,19	enrolled	100:12	6:8	52:18
Emergency	38:12	errors	examined	Exhibit-972
119:14	95:20	25:1	6:5	69:19
emerging	ensued	escapes	Excellent	Exhibit-973
98:13,18	90:11,16	70:25	132:24	99:4
100:9	91:13	Esquire	133:19	Exhibit-974
employee	109:20	5:13	Exchange	118:13
129:12	enter	essentially	120:14	Exhibit-975
employees	75:24	39:14	exclusion	132:10
22:17	entire	108:2	67:6	Exhibit-976
64:5	31:15,16	established	exclusionar	132:20
108:24	61:22	27:19	y	Exhibit-977
109:10	63:22	29:5	27:23	133:9
129:21	64:19	evaluated	29:7	exhibits
encourage	65:4,6	98:17	64:24	133:23
33:24	79:2	evaluation	67:10	exist
75:25	environment	101:15,21	68:9	121:3
encourageme	11:3	102:6	94:15	122:15
nt	18:1,10	event	exclusive	existence
36:13	23:23,24	78:19	61:9	115:19
end	24:5,7	103:19	exclusively	exists
10:25	38:25	eventually	107:12	47:14,21
35:21,24	45:3	43:9	117:19	exit
36:22	47:22	47:16	129:25	75:25
37:9	66:9	64:8	excuse	expand
63:11	87:18	85:21	66:25	79:16
79:10,12	98:8	everyone's	113:19	80:11
92:14,21,	101:3,6,	109:13	Exhibit	124:8
22 94:7,	17 103:2	evidence-	11:13	expanding
12,14	environment	based	26:22	31:21
102:9	s	45:6	52:15	expansion
134:6	26:12	Ewers	69:17	expect
endorsed	38:24	5:22	99:2	60:22
116:1	101:11	exact	118:10	89:7
ends	103:3	36:1	132:9,19	expectation
85:7	EOY	105:24	133:7	
109:22	10:24	106:6	Exhibit-965	
English	92:22	113:18	11:20	
127:19	equipment		Exhibit-970	
	113:7			

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
Index: expectations..fine

43:9,11	91:8	123:24	24:14	52:11
85:20,23	expressed	124:3	25:10	58:21
expectation	108:18	129:16	79:22	63:1
s	113:20	faculty	88:24	81:6,17
24:15	extended	24:16	89:10,11	83:25
25:16	77:22	76:8	120:3	85:5
84:9,24	extensive	79:2,3	February	86:2,6,9,
85:11	89:12	87:19,20,	52:22	14 87:1
expected	extent	24,25	53:20	88:5,7,
102:18	40:14	103:20	69:24	10,14,15,
expenses		failing	70:8	19,20
113:6,20,		45:22	federal	89:6
23 114:2,	F	fair	44:4	92:23
8,15		28:2	70:16	93:10,13
experience	face	50:16	99:23	94:3,19
62:10	121:25	68:4	120:1	101:5,9
106:13	face-to-	101:9,13	federally	102:10
109:1,6	face	115:25	82:6	128:9
experienced	84:22	125:25	129:15	field
73:12	facilitate	fall	feedback	106:20
experiences	95:6	15:15	60:13	121:3
26:4	facilitated	36:18	61:23	127:11
experiment	37:20	77:21	62:4	figure
30:23	facilitator	94:21	89:17,20	73:10
experimenti	s	falls	feel	79:21
ng	62:20	15:14,16	7:20 8:8	80:7
77:25	fact	34:16	12:16	figures
experiments	75:14	119:19	26:2	113:18
16:24	95:22	familiar	feeling	114:1,4
expertise	106:11	95:21	9:9 95:7	filed
31:19	126:4	fashion	Feldmann	11:14
62:8	factor	14:22	111:21	filings
72:19	68:8	fast	felt	19:14,15,
expires	factors	95:8	59:2	16
110:12	66:5	faxing	102:2,3	finalized
explained	67:4,13	93:3	FEMA	60:11
6:22	68:1 69:1	Fayette	119:13	find
exposed	89:17	56:13	fidelity	24:22
59:11	94:16	FBA	22:21,23	25:8
exposure	120:15	40:7	40:22,23	fine
	121:24	features	41:4,7	8:20
	122:2		51:24	124:24

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
Index: fine-tune..funding

fine-tune	125:1	47:11	23:21	65:9
104:12	126:12,	48:1,22	29:13,17	frustrating
finish	15,17	50:2 51:7	30:14	73:3
8:3,4,22	127:18,21	57:21	32:7	FTE
finished	129:25	63:18	33:12,19,	129:10,11
49:7	130:1	68:15	25 34:12,	full
focused		74:17	21,23	38:23
firm	28:20	75:12	36:5,7	66:19
19:21	107:12	79:8	37:5,8,	79:2
fit	focuses	82:11,12,	14,23	100:15
80:4	107:6	19 91:17	40:5	103:23
128:25	focusing	96:12	67:19	full-time
flexible	55:24	100:24	85:21	64:8
78:6	104:10	101:18	86:4 91:3	108:8
flip	folders	103:6	106:18	110:16
27:5	44:21	130:10	107:11	full-timers
Florida	46:20,24	131:20	114:21,	108:11
30:2	folks	formal	24,25	fully
32:19	60:13	49:13	116:9	9:12
56:11	106:14	formalized	123:2	85:24
86:11	121:17	46:18	frameworks	87:11
107:22	follow	77:19	106:21	function
flows	46:24	formally	115:11	118:6
126:23	follow-up	128:22	free	functional
fly	84:7	forming	7:20 8:8	28:8 40:8
111:4	force	32:21	12:16	48:18
focus	103:22	81:1	113:22	62:10
28:2,20	forced	formula	freezes	87:11
54:11	33:14	44:15	7:18	functionali
55:11,13,	Forest	Forsyth	frequency	ty
22 56:16	18:25	77:2	78:4	92:2
57:5	19:12	128:3	frequently	functions
58:25	forget	forties	77:7 78:9	15:6
83:4,12,	73:25	110:4	84:14	107:9
13 107:15	form	forward	131:3	fund
119:7,12	18:13	30:11	front	114:11
120:10,	32:8 33:8	58:10	12:23	funded
15,17	35:9	founders	19:18	62:6
121:9,14,	40:20	17:7	fronts	110:11
23	41:21	framework	119:24	114:6
122:11,	43:4	14:21,22	fruits	funding
12,20		16:17,19	33:15	
123:17,19				

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
Index: funds..grade

110:8,13,	93:6,8	110:15	92:15	92:17
16 113:7	96:15,23	George	93:21	96:22
129:6,10	98:9,21,	16:24	107:14	97:3,13,
funds	24 102:19	17:5 24:4	108:3	15 98:4,
113:10	103:4,14	28:13	110:15,21	8,16
future	105:5	30:1,12	112:22	99:25
64:11	109:18	54:23	114:18	100:6,10
102:20	110:8,19	56:19	119:5,14,	101:8,14,
	112:22	Georgia	17 126:17	16 109:3
	114:7	5:7,9,24	128:3	131:19
G	115:14,	10:2,5,	130:8	goal
	15,25	10,13	Georgia's	54:11
G-U-D-E-N-	118:11	13:3,9	11:9	55:10,24
R-A-T-H	Gadue's	16:1	29:14	56:15,23
112:12	21:12	18:25	give	57:4,14,
GA03425886	28:2,19	22:6	9:1 11:18	20 58:15
69:22	gain	23:15	21:3	61:6,7,9
70:4	91:7	26:24	22:11,12	67:22
GA03429605	gap	27:17,23	28:16	69:4,7,8,
99:3	58:8,10,	29:11,21	36:11	9 80:15
GAA03425967	12 74:14	31:14	69:25	85:25
52:17	Gardner	32:2,16	73:18	goals
Gadue	5:21	33:11,24	109:12	18:5,8
10:1	116:17	34:11	130:14	88:1
27:9,18	Garry	35:7,13,	131:1	good
29:17	66:4	18 36:21	giving	6:10 9:11
30:13	69:23	37:20	51:11	17:10
32:7	70:8	38:5	GNET	26:2,5
33:11,18,	gathered	40:12,19	47:10	59:2
24 34:11	92:17	41:7,13,	GNETS	63:6,9
41:17,25	Gay	18 43:10,	10:4,8,10	66:1,3
42:22	70:14,15,	11 44:3	17:21,22	67:14
48:21	19,23	46:13	18:1,11,	91:11
49:14	geared	49:13,18	19,23	92:5 95:9
63:12,15	64:21	51:19	19:3,7,8,	121:1
74:13	GEMA	52:2	9,10,11	Goodman
76:19	119:13,	54:14	22:3,5	81:10
78:21	19,20,21	63:22	33:18	Government
79:15	general	64:20	34:2,4,6	120:1
83:9,16	16:7	66:7	37:2,18	Governor's
84:2,9	96:23	67:23	43:6	110:15
85:11	97:1,4,16	73:13	47:14,15,	120:2
86:2		74:15	16,21,23,	grade
92:8,19		77:20	25 84:20	46:25
		81:21		
		88:16,23		

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
Index: grades..holistic

grades		Harris	helped	72:9
44:16	H	117:7	13:2 55:1	Hill
45:22		head	71:18	5:5 6:4,
grant	H-I-L-L	7:15 66:7	95:6	10,20
13:17	6:20	heading	helping	11:23
19:4 62:7	half	27:16	14:21	27:5
110:12,17	13:23	health	30:8 41:6	52:21
112:8	129:13	11:9	42:11	69:23
113:4,5,	half-time	14:12,19	76:7	70:7
16 121:12	129:20	15:1,3,4	82:20	72:12
grants	hand	24:3	89:22	90:25
119:25	62:3	115:18	108:13,16	99:8
121:11	128:25	118:1	129:14	109:22
graphs	handles	120:7,12,	helps	111:14
92:3	14:18	15 121:6,	35:6	117:3
great	Handville	10,13,15	62:13	131:22
123:11	20:11,12	122:4,5	128:9	133:2
124:2	happen	124:6,7	Hernandez	hire
ground	16:20	127:14,18	5:25	112:15
33:9 85:1	32:20	130:9	90:14	hired
group	38:12	healthcare	hey	18:20
25:15	85:8 90:5	122:3	72:25	28:7 58:9
44:12	happened	hear	89:21	hires
87:5	69:10	7:21	102:25	13:4
128:8	80:24	111:15	high	hiring
grow	106:4,9	heard	27:22	34:24
124:7	happening	39:25	32:24	108:7
Gudenrath	60:7 65:5	81:4	46:24,25	112:18
61:24	77:20	128:23	51:2	119:10
112:10,11	127:16	hearing	110:5	history
Gudenrath's	hard	106:20	128:10	67:6 68:9
62:18	39:22	Heather	high-fidelity	hit
guess	68:18	30:1,12	95:25	56:7
67:14	73:6 95:2	54:23	higher	hitting
guidance	harder	heavy	67:17	57:15
49:2	68:12	75:14	79:13	hold
Gwinnett	harmonize	79:18	88:10	104:3
36:9	81:18	held	95:25	124:19
	87:22	13:21,22	highest	holidays
	harmony	46:21	15:23	60:18
	82:3,7	98:16	highlighted	holistic
			71:10	13:19

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
Index: HOLKINS..improvement

14:22	113:1,10,	43:20	59:12,18,	58:15
16:12	15	45:6	21,23	59:24
32:14	idealized	54:11,20,	60:5,10,	62:9
56:21	96:12	24,25	20,23	71:13
79:24	identifiabl	55:3,10,	61:21	72:21,24
HOLKINS	e	24 56:7	63:17	73:25
132:24	82:6	59:18,23	74:15	74:16
home	103:10	60:6,20,	82:10,17	84:10
108:21	129:15	23 61:21	83:10,17,	85:12,18,
Homeland	identificat	82:10,17	24 84:4,6	19 88:5,
119:15	ion	83:10,17,	87:3	11 89:2
honestly	11:21	23 87:2,	95:23	91:7,15
7:1 88:3	27:3	10 88:9	103:13	92:19
hoping	52:19	95:23	illness	95:25
36:22	69:20	96:6	66:23	109:7
Horner	99:5	103:13	imagine	implemented
16:24	118:14	132:16	30:4	35:18
17:4 24:4	132:11,21	III	39:23	36:21
hour	133:10	37:13,15,	58:9 64:7	37:4,7,13
9:3	identified	16,18,23	68:18	98:1
house	46:9	38:4,11,	74:4	101:22
62:24	identify	20,21,22	81:14	102:12
housed	13:14	39:4,6,	immediately	implementin
105:20	47:14	11,12,20,	64:16	g
houses	120:18	21 40:1,	implement	21:9
62:25	121:24	4,7,15,	29:11,17	34:23
huge	IEP	17,19	30:13	35:23
58:19	18:3	41:1,9,	34:10	36:13
hung	39:15,17,	12,19	37:23	40:4
125:20	22,24	42:1,7,	74:2	81:16
hybrid	40:1	10,12,17,	75:20	89:10
78:2 80:8	43:18,24	19,23	91:6	94:10
103:3	44:1	43:3,10,	116:9	109:1
I	45:16	12,17,20	implementat	important
I-E	47:8	47:22	ion	37:1 66:7
112:7	48:4,5,8,	48:13,20	22:4,22	69:1 74:2
IDEA	11 50:5,	49:1,8,	23:18	improve
110:13,18	19,24	10,14,18,	30:6,10	29:13,18
	IEPS	22,24	33:14	30:14
	18:17	50:9,17,	34:22	85:1,19
	II	18 51:4,	54:11	107:13
	25:5,14	21 52:4,	55:11,25	115:23
	37:8 41:8	10 56:16,	56:16	improvement
		24 57:5	57:5	43:14
		58:15,18,		
		21,24		

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
Index: improving..Introduction

81:25	increasingl	inference	inside	interfere
82:5	y	53:22	19:6	77:24
103:9	75:19	inform	96:18	122:2
129:9,16, 22,24	increments	30:7	inspect	interim
	102:14	information	89:22	38:7
improving	indication	9:4 10:22	inspection	interject
41:15	66:15	15:19	87:13	60:4
67:20	67:16,18	21:4,18,	install	internal
in-person	indicator	22 37:22	31:22	107:6
103:2	66:17	40:18	75:21	internally
in-school	indirect	68:5,11	87:7	21:18
67:4 68:5	14:25	91:2,10,	installing	114:12
93:24	Indirectly	25 120:23	98:12,18	interrupt
inaccurate	83:11	informed	instance	8:2 43:5
38:17	individual	36:15	86:11	112:19
incentives	44:23	91:9	instruct	interrupted
24:22	45:8	infrastruct	17:18	66:23
inception	46:11	ure	instruction	interventio
106:12	62:1	35:4	16:11	n
incident	64:10	inherited	25:4	40:9
104:12	76:3	123:13	38:24	48:18
incidents	78:23	inhibit	45:4	interventio
96:9	83:6,10,	9:16	57:13	ns
include	18,19	initial	105:15	10:16
14:14	104:22	16:23	106:1	23:15
31:7	117:7	28:7 56:2	instrument	25:5
118:25	individuali	74:14	40:22	29:4,12
127:13	zed	91:15	Integrated	44:23
included	43:22	initially	120:8	45:6 47:6
11:17	50:7 51:1	30:15	integrating	51:3
includes	82:19	63:12	123:19	intrinsical
53:3	individuall	117:17	integration	ly
59:23	y	initiative	18:10	125:23
including	44:14	13:4,5	81:22	introduce
27:24	individuals	16:9,21	121:4	5:14
inclusive	17:6	19:4	intense	30:17
67:11	63:21,25	58:10	51:2	73:5
increasing	64:4	74:6	intensive	introducing
79:14	inexperien	initiatives	25:21	86:22
	ed	55:23	39:16	Introductio
	75:19			n

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
Index: inventory..lawsuit

27:17	23:19	133:15,24	44:22	large
inventory	111:6,16	134:7	47:21	34:17
40:23	124:15,16	joined	55:4	36:9
41:4	Jessica	5:24,25	56:3,11	63:24
51:24	5:21	joining	67:12	87:20
52:11	job	20:18	76:16	119:25
58:21	6:25	Jones	78:18	128:24
63:1 81:7	13:12	14:3	82:5	large-scale
84:1 88:7	30:16	Jotform	84:13	35:1
94:19	51:12	96:17	94:1	73:14
invest	81:2	97:9	95:20	largely
31:4,25	107:9	journey	96:3,19	13:18
invested	129:14,19	30:9	98:11	24:6,25
28:23	Johnson	Justice	102:24,25	45:2 62:8
investment	5:23	6:15	103:20	83:21
75:15	17:17	Justin	104:1,6	86:7
invited	18:13	5:5 6:4,	107:8	larger
34:7	19:21	20 52:25	113:1	76:6 87:6
involve	22:8,10	107:1	117:18	largest
121:19	32:8		121:13,22	36:9
involvement	35:9,14		123:20	125:1
23:14	40:20		125:11,23	
issue	41:21	K	127:10	launch
8:13	43:4		knew	28:12
issues	47:11	K-12	67:19	launched
125:22	48:1,22	27:24	knowledge	13:3
item	50:2 51:7	29:14	12:25	59:10
110:19	57:21	Kansas	97:8	launching
112:21	63:8,18	19:2	115:10	19:3
items	68:15	Kelly	131:21	28:15
11:17	71:22,25	5:21	L	56:6
112:21	72:2,5,10	Kent	lack	Laura
114:6	74:17	71:20	117:23	5:20 19:1
J	75:12	72:17	lag	law
J-U-S-T-I-N	79:8	73:9	7:19	7:6
6:20	82:11	kids	language	lawmakers
Jeannie	90:17	118:1	127:19	31:24
14:19	91:17	kind	languages	Lawrence
	100:24	13:18	106:22	14:17
	101:18	23:22	laptops	15:2
	103:6	28:10	114:9	lawsuit
	116:18	38:24		6:16
	130:10			
	131:20			
	132:22			

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
Index: layering..lower-upper

19:14,17	26:12	liaison	live	24:3
23:7,10	27:21	99:24	103:18	30:23
layering	32:11	119:12	local	56:25
55:14	45:14	120:4	17:14	66:7 68:1
lead	66:9	124:2	locate	80:17
18:9	105:13,25	likes	133:16	88:23
43:24	106:2	119:21	located	97:20,21
45:15	115:6	Lill	118:21,24	116:14
46:1	121:5	5:21	location	125:18
61:24	125:15	limitation	127:22	loops
62:2	LEAS	36:16	locations	62:4
64:11	71:14	limited	75:25	89:17
91:11	leave	31:14	logically	lost
leaders	24:16	56:9	126:23	90:17
92:3	left	77:14	logs	lot
leadership	58:7	78:16	120:25	41:13
15:24	legal	130:21	long	46:22,23
16:8,20	96:10	linked	13:21	57:16
17:13,15	lessons	61:11	20:14	62:10
58:10,12,	30:5	128:11	31:23	64:3
23 62:14	level	lion's	46:16	67:12
75:17	15:23	110:13	58:12	75:22
76:8	16:18	list	63:15	76:14
78:16	17:14	82:6 94:6	71:4 73:4	77:21
79:3,4	22:19	96:14	95:6 96:8	85:17
82:20	24:12,13	98:24	99:14	89:15
88:18	28:10	128:24,25	119:21	98:5
leading	29:7	129:16	long-term	101:3
106:13	33:10	listed	30:21	106:14,15
lean	35:5 51:2	12:12	73:2	122:1
113:17	62:22	119:5	longer	126:3
leaned	73:25	120:6	57:9	Louisiana
31:1	79:5 84:8	122:6,8,	91:14	33:15
113:5	88:9	17	93:3	love
learn	98:22	126:10,	100:3	67:21
30:5	109:2,3,	16,18	116:20	74:11
learned	7,8,14	lists	120:24	95:17
31:2	119:14	103:10	Longitudina	low
108:17	levels	129:18	1	51:2
learning	85:18	litigation	96:18	110:3,5
23:22	133:4	20:18	looked	lower
24:9	Levert	lower-upper		109:15,23
	5:22 70:2			

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
Index: lowest..mental

109:16	make	111:7	math	85:15,16
lowest	16:19	112:8	44:18	100:8
67:16	24:7	119:10	111:3	meeting
LRE	29:22	124:18,	127:19	119:20
11:2	31:11	22,24,25	mathematics	123:12
100:14	33:1,5	125:12,	38:22	meetings
	34:21	20,21,23	81:11	34:8
	43:23	126:6	Matt	84:16,22,
M	46:12,17	managers	14:3	23 85:14,
	47:16	109:15,23	matter	17
M-I-R-I-A-M	53:22	110:5	5:6 36:10	Melanie
112:11	54:19	mandate	66:1,2	5:23
Macon	64:1	36:12	McGiboney	19:21
84:17	67:21	115:8	66:5	20:7 72:3
made	81:4 82:2	mandated	69:23	member
22:16,24	87:25	43:20	70:8 71:7	31:12
25:21	89:5,23,	44:2,8	Mcintosh	111:2,3,
44:23	25 91:9	mantra	71:21	6,16
45:13	95:13	117:18	72:17	112:12
46:14	120:22,25	March	73:9	129:19
47:7 56:5	123:14	5:2 11:16	Mckay	members
88:13	126:22	53:9	131:15	14:5
102:13	127:10	mark	means	30:20
125:8	makes	132:8,18,	125:24	31:15
mail	22:19	23 133:6	126:7	80:1
22:15	41:2	marked	measure	memo
main	104:13	11:13,21	66:19	22:2
45:22	106:15	27:3	87:20	132:4,5,
93:1	making	52:14,19	101:21	7,17
120:14	31:10	69:17,20	102:6	memorialize
maintain	62:3	99:1,5	103:23	d
30:11	86:25	118:9,14	measures	80:12
33:21	manage	132:11,21	86:2,6	memory
maintained	108:13	133:10	88:14,15	70:25
40:10	management	marking	medication	memos
55:23	62:8	26:21	9:15	21:16,21,
91:5	119:14	Mary	meet	25 22:23
major	manager	14:17	18:24	131:23
41:5	13:5	15:1	20:2,14	132:3
majority	14:20	Master's	48:10	133:1
24:24	58:8,9	16:10	84:14,16,	mental
67:22	86:12	108:25	17,18	15:4
	97:19			
	108:12,15			

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
Index: mentality..network

120:6	metro	model	Moore	20
121:6,10,	30:19	13:18	111:23	multiple
13,15	77:1	24:3,18,	Morris	46:4
122:4	Michigan	20 76:12	14:20	multitiered
124:7	32:17	79:7	23:19	11:6
127:14	61:14	83:19,20	111:6,16	107:12
mentality	81:8,9	127:4,6,8	124:15	Murphy
106:19	107:21	128:5,16	Morris'	5:10
mention	109:4	models	124:16	
81:4	mid	78:2	move	<hr/> N <hr/>
122:23	109:14	105:3	30:11	
mentioned	110:3,4	modificatio	39:15	
17:9	middle	ns	55:6,19	Nakeba
23:13	8:21	82:3	57:24	99:10,11
46:5	46:23	moment	71:13	100:2
57:18	47:2	23:12	106:2,8,9	names
67:25	miles	70:1	moved	126:2
80:20	117:24	90:13	32:10	national
86:7	118:3	Monday	57:10,18	28:6,14
92:22	Milestones	5:2	105:25	29:20,23
94:7	77:20	money	125:14	30:2,3,7
121:19	million	32:3	moving	31:2
123:20	113:1,10	110:23	58:9,17	62:20
130:15	Mimi	112:23	59:4	89:4,20
mentioning	61:24	113:11	98:14	106:14
126:1	62:18,21	monitor	MPSS	nationally
menu	112:10	92:8,11,	13:16,18	127:16
55:15	mindset	19	MTSS	naturally
103:1	76:2	month	11:5	24:22
merge	minimum	77:19	14:21	nature
14:21	58:14	105:24	32:13	125:7
32:13	100:8	106:6	61:7,9	necessarily
61:1	minutes	117:5,6	79:25	36:8
79:21,23	9:3 20:16	monthly	81:22	114:21
107:1,10	134:2	84:15	106:18	needed
122:16	Miriam	85:17	107:11,	25:22
merging	112:10,11	129:20	14,17,23	86:18
33:9 60:7	mission	months	109:4	network
106:25	117:19	37:12	122:13	10:6
met	missions	49:8	multi-	16:19
57:14	51:13	58:13	tiered	84:11,13
metrics		128:14	122:8	85:13
97:16			123:1,5,	

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
Index: newest..open

newest	nuanced		occur	8 107:5
112:15	50:14	o	105:21	108:5
nice	nuances		occurred	117:3,16,
26:6 58:8	22:22	oath	99:20	19 118:7,
101:4	number	7:4,5	occurring	11,24
Nicholas	22:2	object	24:23	119:8,11
20:9,11	36:1,25	8:12	October	120:2,4
nineties	40:4	18:13	13:23	123:25
109:16,24	42:15	32:8 35:9	14:1	125:14
110:6	45:9	40:20	106:9	129:7
ninth	52:5,22	41:21		130:7
46:25	56:2	43:4	ODR	131:4,13
nod	62:21	47:11	101:8	offices
7:15	66:13	48:1,22	ODRS	106:22
non-	67:25	50:2 51:7	10:18	official
classroom	70:3	57:21	46:4	32:6
75:23	76:24	63:18	offer	94:6,10,
76:1	77:14	68:15	36:13	11 124:22
non-pbis	78:16	74:17	42:7,23	128:18
116:14	79:12,13,	75:12	78:4	131:16
nonacademic	14 85:10	79:8	85:21	officially
13:16	92:16	82:11,12	offered	28:4
117:20	94:7,13	91:17	59:6	115:22
129:16	95:19	100:24	128:8	125:10
normalized	115:19	101:18	office	oftentimes
59:3	119:23	103:6	10:19	61:11
north	numbers	130:10	15:16	85:15
37:9	21:17,22	131:20	25:1	one's
Northern	22:1,11	objection	42:5,6	108:12
5:8	36:11	35:14	46:4	one-day
Note	37:11	objections	49:19	78:18
8:11	114:14	8:13	57:11,19	ongoing
notes	nurse	obligation	81:25	31:13
22:10	120:14,	7:6	90:7	online
notice	20,21	obvious	93:23	22:23
11:14,16	nurses	55:5	95:17,18	34:9
12:4,12	15:4	occasion	98:4,5	93:1,4
November	121:3	83:3	101:7	98:11
60:14	nursing	occasionall	103:12	onsite
nutshell	14:12	y	105:5,7,	84:15
114:13	120:25	8:11	9,11,12,	118:1
	nutshell	occasions	13,16,18,	open
		43:16	22 106:3,	

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
Index: opened..PBIS

80:18	out-of-	pardon	103:18	113:22
opened	school	112:10	131:11	PBIS
80:25	67:5 68:6	parent	participati	10:15
openings	93:24	66:16	ng	13:2
108:7	outcome	parents	66:16	14:15,22
operating	95:15	66:12,19	127:25	15:14,16
72:25	outcomes	Park	128:4	16:17,22
operational	17:11	18:25	participati	17:7 19:3
98:19	outline	19:12	on	21:10,12,
100:9	80:15	part	33:22	13,20
operational	outset	101:10	66:14	22:4,18
ized	86:1	106:12	93:14	23:20,21
98:13	overarching	117:18	particulars	24:2,12
operations	113:1	119:12	22:22	25:23
59:3	overburdeni	126:21	partner	26:6,8,
opinion	ng	part-time	52:8	13,14,17,
43:16	80:5	62:6	partnered	24 27:8
50:21	overlap	110:3	29:20	28:3,14,
51:4	123:6	112:12	54:24	20,23
Opportunity	oversights	129:12	partnering	29:2,13,
6:13	62:22	part-timers	28:13	17 30:13
optional	overwhelm	108:9	partnership	31:23
34:3	73:6	109:17	121:19	32:6
orally	overwhelmin	110:10	partnership	33:7,12,
7:13	g	partial	s	14,19,25
order	124:9	100:15	33:8	34:12,21
64:12		participant	121:20	35:8,13,
Oregon	P	s	parts	18 36:5,
17:5 41:5		94:11	103:12	6,21
52:9	p.m.	participate	pass	37:5,8,
62:24	5:3	36:4,11	46:22	14,24
71:21	90:15,22	37:19	past	40:5 42:6
organic	116:22,25	84:22	116:15	48:21
124:9	134:16,18	103:23	Patrick	49:4,14,
organizatio	pages	113:21	5:10	18,19
n	94:25	129:14	pattern	51:4
26:2	pandemic	participate	67:6	52:4,7
organize	69:13	d	pause	53:4
108:13	paragraph	66:11	57:17	57:9,18
	119:1	79:6,11	pay	62:23
		88:8 95:3		63:12
		96:6		67:19
				74:14
				77:12
				78:9 80:1
				84:10,12,

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
Index: peace..poor

20 85:12,	pending	personal	25:3 29:6	plan
21,25	5:8 8:21	51:8	31:18	26:23
86:4 89:1	people	personally	34:23	27:9
91:3	17:2 21:9	88:12	35:2	48:18
92:10,20	26:1	Personnel	36:17	55:7,20
93:9,25	31:22	13:17	44:5 45:4	56:25
94:5,9,17	52:22	perspective	46:16	57:2
96:5,9,23	55:18	17:8 28:5	47:7 48:8	79:20
98:9,12,	58:20	pertain	54:15	80:14,16,
24 101:14	63:21,23	21:10	55:17,19	20 84:5
103:15	64:15	Petri	57:1 65:1	132:18
105:6,9,	70:11	89:1	71:1 73:4	133:6
12,19	108:5	Phillips	74:1,7,11	planning
106:12,15	113:21	111:25	78:25	19:5 40:9
107:6,8,	125:20	philosophy	79:23	plans
9,10,11,	percent	28:23	81:24	33:8
19,20	24:25	64:18	82:23	43:23
108:6	25:10	phone	83:8	50:7
109:1,2	35:19	20:7,15,	84:25	79:16,19
110:9,22	69:4	21 116:19	87:11,16,	80:11
111:20	84:21	picky	17,24	84:2
113:11	87:14	114:20	97:22,25	119:17
114:7,19,	95:25	piece	102:4,7	play
20	100:8,11,	58:22	114:24	25:23
115:12,16	13,21	61:25	117:7	61:25
116:5,9,	percentage	pieces	placement	played
13 122:14	100:22	25:3	47:25	41:5
123:16	113:13	46:21	places	plug
124:17,24	percentages	80:9,10,	105:20	95:19
125:1,6,	95:16	19 87:17	placing	point
8,12,21	perception	89:5	88:22	8:7 30:24
126:1,4	26:1	91:23	plaintiff	94:24
132:13	Perfect	92:2	23:6	100:6
133:4	12:2	93:16	Plaintiff's	Polansky
peace	65:17	96:3,21	11:13,20	5:21
65:7	person	104:2,13	26:22	policy
peeled	5:25 34:9	105:2	27:2	66:4
113:14	85:6,15	122:4,6	52:15,18	90:1,3,6
peer-led	99:25	123:19,21	69:17,19	poor
121:22	100:6	127:14,17	99:2,4	33:15
pen	108:13	place	118:10,13	66:18
120:24	119:9		132:8,10,	67:17
pencil	120:22		19,20	
120:24			133:7,9	

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
Index: population..programs

population	29:7 31:8	pretend	73:15	92:23,24
18:11	35:3	35:1		97:22
39:7	64:24	prevent	71:6	128:1
	67:7 68:9	24:6 29:6		129:22
portal	71:19	83:6	prior	
97:4	74:3		20:18	processes
position	75:20	preventativ	47:24	29:5
119:22	78:22	e	48:8	129:24
125:3,9,		33:3	70:17	professiona
13	pray-and-	87:18	105:11,	l
	spray		16,17	27:20
positive	34:24	prevented	129:23	34:25
10:16	36:19	64:23		121:5
23:14		preventing	private	
24:7	precepts	65:5	19:1	professiona
26:13	107:20		46:21	ls
27:19	predictabil	prevention		34:17
29:12	ity	24:3 76:2	proactive	121:17
67:3,18	102:16	106:19	25:3	
76:5	predictable	107:24	76:5,17	proficient
		121:23	79:22	56:10
possibility	26:12	123:23	87:18	77:3
61:3	78:4	130:16	91:9,11	program
			131:2	10:5,8
possibly	predicted	prevention-	proactively	13:5,6
40:10	24:1	based	75:20	14:20
42:3	64:22	23:21	120:18	17:21,22
83:22	preexisting	24:2 82:4		18:12,19,
114:9	61:15		problem	23 19:9
post-covid	prepare	prevention-	25:7	37:3 52:8
59:3	19:24	wise	32:22	68:13
		107:16	87:7,16,	86:12
potentially	20:2 21:1	previous	23 91:12	97:6,19
25:5	23:1	120:11	104:6	108:12
39:14				111:7,19,
43:23	prepared	previously	problems	21,23,25
88:3	22:12	11:13,21	28:18	112:7
94:23	preplanning	53:19	29:6 65:5	114:21
113:25	77:15	110:1	107:16	116:3
practice	present	124:17	121:25	124:17,25
25:18	12:11	130:15		125:12
76:4	20:6 77:4	primarily	proceed	130:16
96:10		91:7	9:20	131:19
practiced	presentatio	principal	90:23	
7:19	n	73:11	117:1	program's
	20:16	103:21		101:14
practices	presently	principals	process	programs
27:23	34:3		43:15	10:10
			46:19	
			80:22	

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
Index: progress..reach

19:10	provide	published	61:24	quickly
22:3	12:11,18,	27:11	66:19	17:19
33:18	22 15:8,	98:24	74:1 81:3	29:2 67:7
34:2	12 18:8	pull	102:3	73:22
35:23	27:20	11:19		89:8
37:2	31:12	118:16	Q	quote
70:16	38:11	pulled		27:17
96:22	39:4,6	19:18	quality	29:2,10
97:3,15,	40:15,17,	pullouts	86:10,13	75:6
23 98:16,	18 41:10,	22:5	quarterly	
25 99:24	18,25	punishment	84:14	R
114:18	42:12,14	96:9,13	85:15	
115:11	43:10,13	purpose	131:7,8	R-U-F-E
116:2	50:8	23:25	question	112:16
progress	51:15	64:21,22	8:4,8,9,	Rahming
39:15	52:4	purposes	21 9:5	99:10,11
progressed	75:6,10	103:5	15:8,12	100:2
31:1 87:1	76:19	purview	16:15	rally
project	82:9,13,	15:14	22:21	24:16
30:2	16 83:2,	push	55:9 69:9	random
41:14	9,16 88:5	73:6	78:3	28:17
81:9	97:16,17	put	88:12	rare
109:5	103:1,15	8:12	100:17	83:3
121:12	104:16,17	21:16,21,	110:7	rate
projects	113:22	25 24:13	123:4	73:21
16:10	127:21	25:9 37:3	questions	rates
promoted	129:20	38:15	6:24 7:1,	27:22,24
70:24	130:2	55:7,20	10,13,21	66:14
promotion	provided	56:24,25	8:4,12,14	67:5
71:1	37:15	57:1	9:12,17,	93:14
prompted	59:23	80:13	19 12:13	rating
106:10	61:23	94:1	15:15,21	53:17
107:4	77:8	98:23,24	20:4 21:8	65:19,21,
propensity	109:18,25	102:4	33:3	22 67:15,
128:11	110:8	117:25	40:13,25	24 68:3
proposing	129:7	127:17	41:9 90:4	69:6,11
101:14	21 77:16	132:17	132:14	115:22
prosperity	79:16	puts	134:5,8,	116:11,13
65:7	84:3 92:3	7:6	13	re-think
protocol	proving	putting	quick	65:11,12
104:7	33:17	31:25	111:1	reach
	publicize	60:2	116:19	
	98:21		quicker	
			73:18	

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
Index: reached..remained

41:13	recalibrati	7:25	redo	101:14
130:20	on	27:12	123:12	104:25
reached	57:25	71:3	refer	regionally
29:7	recall	99:13,17	10:1,4	97:11
reaching	58:13	118:18	referencing	108:20
55:17	101:23	122:5	22:15	regular
75:17	102:5	recognized	referral	17:25
react	receive	85:5	93:23	85:9
82:5	15:19	recommenda	98:4,5	regulations
reacting	39:11	ion	101:7	35:7,12
23:23	43:17	46:12,18	referrals	reinforce
read	45:5	102:4	10:19	25:16
19:13,16	49:22	recommenda	46:4	reinforceme
20:17	50:17	tions	95:17,18	nt
132:2,6	78:9,13	43:23	96:1	25:17
reading	79:15	44:15	123:25	reinstall
38:21	96:1	46:14	referred	104:1
44:19	102:19	recommitmen	125:12	reintroduce
72:5	received	ts	referring	6:11
81:10	16:2 43:2	35:21	10:9	relate
ready	48:20	reconfirm	129:5	15:7,11
90:17,20	49:13,18	12:21	reflect	16:6,13,
real	56:3	record	73:17	14
111:1	100:23	5:1,15	95:13	related
116:19	103:4	6:11,19	regard	11:17
reality	128:18,22	7:15 8:13	89:13	21:3 93:9
118:7	receiving	90:10,11,	region	relates
125:5	38:23	12,14,16,	17:14	110:21
realize	43:24,25	21 91:13	32:3 35:5	relationshi
37:1	45:16	109:20	97:13	p
realm	48:8	116:18,	109:7	28:5
48:17	50:6,25	21,25	regional	30:12
reason	77:8	134:1,10,	10:8,10	40:11
8:20 9:11	80:21,23	15,16	19:10	102:24
57:20	81:14	recorded	32:1	119:16
71:5	recently	7:11	33:18	relay
reasonable	59:22	recordkeepi	34:2,8,19	84:23
47:4	131:7	ng	60:13	relying
reasons	recess	120:24	64:6,9	15:20
107:3	116:23	records	96:22	remained
	recognition	38:6	97:3,15	
	133:4	68:12	98:16	
	recognize			

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
Index: remedy..Robinson

102:12	reporting	required	resource	29:7
remedy	93:8	91:4	112:9	results
64:16	96:23	97:15	resources	93:22
130:6	111:17	requirement	108:16,17	retired
remember	124:10	44:4	respectful	70:15
9:3 20:13	reports	requirement	24:20,21	retrained
87:5	14:4,16,	s	respond	73:16
99:19	17,25	96:23	15:21	retrieve
117:5	124:15	requiring	25:2	36:1 52:6
remote	represent	39:19,21	responding	retrieved
5:10,11	5:12 6:15	RESA	25:12,19	114:16
remove	14:5,8	62:14	response	reverse
67:7	17:7	76:12	9:4 12:11	71:17
111:13	representat	82:24	64:25	72:16
125:8	ive	83:14	99:11	review
removed	6:2	84:12,17	response-	21:14,23
125:10	120:21,22	104:25	wise	29:5
rent	representat	108:21	107:17	81:24
113:24	ives	RESAS	responses	reviewing
repeat	14:11	76:23	66:8	61:2
35:11	represented	84:20	responsibil	80:21
41:23	19:20	129:11	ities	revision
72:4 75:6	53:9	research	13:12	27:10
82:15	request	17:8	responsible	revisions
85:14	22:14	30:4,7	105:6,9	80:21,22
replication	77:11	33:13	rest	revisit
17:10	78:5	40:25	108:19	104:1
report	requested	66:24	110:18	Riffle
14:2	21:19,23	71:14,20	131:17	19:1
69:15	requesting	72:12,13,	restate	Rights
124:14	73:16	19 127:11	107:8	6:14
reporter	121:2	researcher	restrictive	risk
5:12,16	requests	88:20	11:3	121:24
7:4,11,13	64:10	researchers	101:17	Rob
16:25	78:8	31:2	restructure	16:24
17:17	97:25	researching	d	17:4 24:4
63:3,7	98:1	73:20	result	Robbins
90:9	require	resiliency	93:23	Robinson
95:10,13	33:11,18	121:22	resulting	
109:19	39:5,10	resilient		
133:23	80:17	121:25		
	93:6,8			

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
Index: robust..school

5:12		21 101:13	39:3,18,	10,11,18
robust	S	112:13	23,25	91:10,14,
54:20		Sandy	40:25	16,19,24
role	S-A-S	61:23	41:9	92:3
13:7,8,	87:13	SAS	42:11	96:5,11
10,13,21,	safety	63:2,5	44:8,22	98:2,3,4,
22 14:2	14:13,19	87:13	46:23,25	12 100:22
15:7,11	15:4	scale	47:2,9	101:8,12
16:6	57:12	17:12	50:9	102:23
23:14	66:8	31:17	51:10,13	103:8,15,
25:23	105:17,23	64:4	53:16,25	17,22
41:5	106:3	73:18	54:12	104:9,16,
62:5,18	115:19	116:13	55:12,25	25
roles	119:5,17	scale-up	56:17,20	105:17,23
108:10,24	125:13	16:10,21,	57:11	106:3
109:11	126:10,	23 17:3	59:3	109:8
110:1	13,14,16,	55:3	62:7,15	110:11,20
roll	17,18	scaled	63:10	112:8
56:7 75:1	sake	54:25	64:10	113:3,16
rolled	124:23	scattered	65:18,21,	114:17
56:14	salaries	28:16	22,25	115:12,
rolling	22:17	31:3	66:3,18,	15,17,21
54:20	109:10,24	77:10	20,21,23,	116:1,3,
56:1 75:2	110:2	schedule	25 67:2,	8,11,12
rollout	113:2,19	78:5	3,5,10,	117:25
74:14,15	114:8	school	14,24	118:1
routine	salary	14:11,13	68:2,7,	119:5,16
85:9	21:18,22	15:3,4	10,13,18	120:14,
131:11	109:13	18:4,10	69:1,5,11	20,21,25
routinely	111:7	24:12,13	71:15	121:2,16
67:8	112:6,14	25:23,25	73:13	122:17,
Rufe	132:4,5,7	26:5	74:5,10	21,22,23,
112:15	Salvatore	28:11,17	76:12,22	24 123:5,
run	14:18	29:13,18	77:22	8,16,18,
69:15	15:2	30:14	78:8,11	23,24
77:5	SAMHSA	31:3,25	79:1	124:11,
rural	121:12	32:24	81:14,25	12,21,22,
30:18	sample	34:18,25	82:22,24	25 125:5,
rut	89:18	35:17	83:1	13,22
36:18	Sandra	36:4,12,	84:8,12,	126:6,10,
	5:22 62:5	23 37:2,	17,19	13,14,16,
	99:9	10,11	85:6	18,20
	100:7,18,	38:10,12	86:25	127:4,6,
			87:8,9,	8,17
			21,23	128:5,16
			88:10,11	129:7,9,
			89:8,9,	13,17,22,

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
Index: school's..short

23 130:19	63:16	17:8	84:21	48:13
133:4,5	65:8,18	24:14,15	90:1	49:22,24
school's	67:22	28:4,21	97:10,13	50:17,19
40:18	68:7 69:4	91:1	132:22	100:23
68:2 69:1	72:14	science	133:11,	129:2,4
75:3	73:10	30:6	15,24	130:3
77:14	75:16	127:20	134:11	session
88:5	76:16	score	senior	19:6
school-	77:8	53:16	14:20	123:14
based	78:7,23	65:18	108:12	set
14:12	79:6,11,	88:22	111:7	84:9
15:1,3	15 82:17	scores	sense	88:21
25:6	83:6,10,	92:24	41:2	93:4
117:25	11,15,18,	93:14	44:22	129:10
120:12	19 84:10	94:23	104:14	sets
124:1	85:5,12,	screen	106:15	44:14
schools	20 86:3	118:10	115:17	setting
17:10	87:3	scroll	121:1	18:4
21:10	88:16	11:23	sentence	80:15
22:3,6	91:3,6,9	12:1,16	100:17	106:23
27:24	92:8,13,	53:6,14	separate	settings
29:3,14	14,16,20	71:23	50:15	25:15
32:21	93:3,9,	99:16	114:18	46:22
33:7,12,	11,21	118:22	123:6	76:1
24 34:12,	94:1,4,8,	126:8	130:23	shake
18 35:3,	16 96:16,	SDE	September	7:15
23 36:6,	24 97:5,	31:25	110:12	Shannon
10,14,21	17,23	section	series	112:2
37:1,4,7,	98:21,25	6:13	132:14	share
13,23	100:8,12	42:19	serve	27:1 86:2
40:4,6,15	102:20	52:10	23:25	110:13
41:18,25	103:5	security	25:13	she'll
42:7,15,	104:22	119:15	64:22	17:19
18,22	106:22	120:3	served	shift
43:1,10,	114:18	seed	11:15	125:25
12 48:20	115:1	32:3	Service	shifted
49:13,17	116:9,13,	seek	32:2	86:12,14
51:19	14 120:3,	43:6	services	shore
52:2,9	16 122:22	selling	27:19	120:3
53:16	128:1,2,	81:15	38:11,19	short
54:14	15,20	send	39:4,6,11	133:3
55:16	129:15,22		43:10,18	
58:23	131:2			
59:7,10,	132:13,15			
15 62:14	schoolwide			
	10:22			

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
Index: show..spoken

show	simple	70:19,20,	7:12	111:20,
11:12	88:20	21	17:18	22,24
24:20	simultaneou	social	18:7 25:1	112:1
26:21	sly	14:12	30:20	129:13
52:14	59:19	15:3	32:5 34:5	specialists
53:24	107:18	124:5	49:15	32:1
69:16		127:20	55:15	34:19
99:1	single		66:20	54:24
118:9	36:12	Social/	74:24	56:10
	39:25	emotional	77:6	62:3,15
showcased	site	115:6	87:15	76:13,22
60:12	18:24	solid	96:2	79:1
showed	82:19	45:3,4	122:16	83:14
12:8		55:16	125:4	84:13
showing	sites	solution	speaking	89:18
47:5	64:9	32:23	66:12	specific
shown	sitting	Solutions	95:8	11:25
20:24	23:23	5:13	speaks	49:10
53:11	skills	solving	16:20	50:6
63:11	28:8,11,	25:7	17:13,15	59:10
side	17 64:16	32:22	special	76:9
32:12,13	109:8	87:7,16,	18:16	78:12
49:3	SLDS	23 91:12	27:18	109:12
131:10	96:18	104:6	34:5	132:12
sign	97:7	sooner	40:10	specificall
35:20	slide	74:1,11	42:4 47:8	y
signals	97:11	130:6	48:15	12:13
79:17	slow	sound	49:2,15,	21:11
significant	17:1	50:12,14	25 50:5,	51:12,18
58:19	63:3,4	sounds	19 51:5	112:23
signs	slow-walk	97:24	57:10,11	126:1
94:2	73:5	Sources	62:12	speculate
siloed	slowly	121:21	70:17,22	64:1
61:16	71:17	130:15	76:8	speed
similar	72:16	South	99:22	73:21
32:25	small	86:11	105:18,22	spell
92:1	25:15	SP	62:6	6:18
106:18,21	30:25	13:17	82:24	spelled
Similarly	60:12	space	84:18,19	115:2
30:15	62:21	75:20	102:23	spent
Simonsen	87:5	speak	104:17	113:18
73:23	128:24		105:1	spoken
	Smith-dixon		109:13	28:24
			110:4	

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
Index: sponsored..students

sponsored	standards	26:24	107:15	strong
95:4	98:17	31:13,15,	129:8,24	47:7
spring	100:10	16 32:3,	stating	structure
77:23	star	16,17	57:19	24:11
85:3	67:15	34:16	stats	124:5,10
94:21	69:11	35:5 36:9	106:24	student
SST	115:21	37:20	status	28:9 31:8
39:14	stars	38:5	32:6 33:6	38:18,21
44:21	57:2	40:12	stay	39:6,10,
46:12	start	41:6,14	45:24	20 40:1
47:10,13,	13:2	44:3,4	101:2	43:17,21,
14,20	31:20,21,	54:16	steady	24,25
48:5,7,10	25 32:21	56:9	92:16	44:5,9,
51:1	45:20	63:20,22	step	10,12
Stacey	46:3	64:20	58:19	45:7,14,
6:1 12:9	54:20	65:24	Steve	16,17,18,
20:8	86:11,21	76:11,14	81:10	19 46:5,
132:4	90:18	88:17,18,	Steven	7,8,15,
staff	started	25 89:2,	112:15	19,24
14:3,5	14:23	13,15	stop	47:23
31:12	17:11	95:5	8:8 12:20	48:4,7,13
38:5	28:13,15	96:18	strategic	50:1
66:25	31:10	97:10,11,	16:9,19	65:12
74:23	56:1,5,7	12,14	26:23	66:7
75:19	66:5	104:16	27:9	85:22
76:7	77:13,16	105:2	28:15	96:18
97:11	80:25	107:14	76:10	115:18
108:19	86:15	108:20	80:13,16,	118:4
110:3,16,	117:6	109:7	20 83:7	120:23
24 111:2,	130:24	110:16,17	student's	46:20
3,6,16	starting	119:14	student-	
112:12	8:5 33:8	121:16	based	
125:18	45:21	stated	strategy	124:6
129:19	53:24	53:19	25:20	
stages	90:19	91:1	stream	students
30:22	state	105:8	129:6	13:14,20
stake	5:7,23	110:20	streams	17:24
109:6	6:18	121:6	110:13	18:2,16
stand	10:10,12,	states	Street	24:8,24
60:5,6	13 13:2,	5:6,19	19:11	25:2,12,
standard	8,16	6:14,16	Strength	19 26:8,
104:7	16:1,18	11:15	121:22	10,11,16,
	17:14	30:5,9	130:16	18 27:25
	23:19	61:14		32:15
		64:25		
		72:21		

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
Index: students'..suspensions

33:4,5	94:4,17	suite	56:22	42:1,5,7,
38:11,15	95:2,18	62:23	63:16	10,14,24
39:19,22	96:20	summer	75:7,11	43:14
43:22	97:3,7	16:4	76:9,18,	48:14
44:13,17,	100:10,13	60:25	20 77:9	49:11,19
24,25	133:22	77:13,23	78:8,10,	51:5,11,
45:2,8,	submitted	superintend	20 79:16	21 52:4
11,21,24	94:11	ent	80:11	55:15
46:3,15	submitting	13:11	82:9,16,	62:11
47:5,10,	94:18,25	30:18	18 83:9,	63:17
15 48:19	substitute	70:16	17,24	64:11
49:21,25	78:17	94:2	84:3,25	90:7
50:16,20,	succeed	100:4,5	85:24	105:7
22,24	129:22	125:16	86:18	107:5
51:5,12	succeeding	supervise	88:6	108:6
66:8,22	129:18	23:18	96:10	117:4,17
67:1,7	success	34:4	103:1	118:11,24
75:24	13:20	supervising	108:3,4,	122:9
95:16,20,	30:21	58:5	21 110:8,	123:1,5
22,23	45:7 46:1	109:2	21 112:22	124:13
96:1	47:5	supervisor	114:25	130:7
100:14,22	117:21,23	34:5	115:11,	131:4,14
101:1,15	118:5	support	14,15,18	survey
117:20,22	120:19	10:6,16	121:2	63:2,5
120:16	successful	11:6	124:4	66:8
121:1	13:15	14:14	127:1	87:12,14
122:2	17:25	27:20	129:2,4	88:2,6
124:3	18:3 25:9	28:9	130:3	93:15
127:18	30:10	29:12	supportive	94:22
students'	32:18	31:13	26:13	115:19
44:16	33:4,5	34:11	87:17	surveys
Studies	44:18,19,	38:19,25	supports	66:11,15
127:20	25 45:12,	39:12	13:11	Susan
study	22 46:8	40:1 41:1	14:6	111:19
114:12	50:10	43:21	15:2,17	suspend
Suber-drake	104:9	44:5,9,	18:2	65:7
6:1 12:9	120:17	10,12	23:15	suspended
20:8	122:3	45:7,11,	27:22	69:10,12
subject	124:4	17,19	28:21	suspension
52:25	Sugai	46:5,15,	32:15	27:25
submit	16:24	20 47:24	38:20,21,	29:8 67:5
92:12	17:5 24:4	48:7	22 39:16,	93:24
93:4,12,	28:13	50:10	20,21	suspensions
16,22		51:15	40:16,17,	68:5,6
			19 41:10,	
			12,19	

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
Index: sustain..tend

sustain	systems	7:24 42:9	67:1	107:6,8,9
34:22	40:7	82:20	71:18	108:2
36:15	43:13	101:5	74:2	109:9
	83:23	106:21	76:9,14,	110:20,
sustainabil	85:24	taller	18 78:13,	21,24
ity	87:3,10	64:12	17,23	112:9,23
36:17	91:10,25		87:15	119:11
swear	107:24	tangible	108:17	122:13,14
5:16	120:23	130:14		123:17,
SWIS		target	teaching	18,20,23,
10:21		18:11	32:11	24 124:1,
21:9 22:6	T	55:4	75:18,19	11,12,13
33:21			105:13,25	
62:9,20,	TA	TAS	106:2	teams
24 90:25	30:2	89:4,21	125:15	28:9,11,
91:4,6,	tackle	task	team	17 32:21,
14,23	77:15	28:7	25:7	25 33:1
92:5,13,	takes	32:12	30:15,16	45:17,19
17,18	34:23	63:24	31:5,14	47:10
132:17	72:23	65:25	32:10,24	48:7
switch	76:10	74:9 76:6	34:15	58:23
116:19	82:22	106:17	36:15	62:14
		107:20	39:14,17	76:8
sworn	taking	tasked	41:9	82:20
6:5 7:3	6:16 8:22	14:21	43:21	106:23
	9:15		44:2,5,9,	technical
system	42:16,18	Tayloe	11,12,20	27:21
10:22	45:4 47:6	5:20	45:7	28:6,14
11:6	61:15	Taylor	46:5,9,	29:20,23
41:1,12	62:2	20:9	12,15,20	30:3
42:12,13	64:3,7	teach	47:13,14,	38:19
43:15	74:7	24:19	17,20,24	54:22
50:10	76:3,15	28:9,10	48:5	73:20
51:14,20	81:6,24,	30:16	49:10,19	telling
52:3	25 106:17	64:19	51:1	71:14
56:21	119:25	78:22	61:20,22	72:13
64:25			63:13,20	
65:22	talk	teacher	78:11,16	tells
67:15	19:24	44:15	79:3,4	8:15
84:8 91:2	20:20	46:11,13	80:1,2	temporarily
94:2	talked	73:11	81:1,3	33:16
96:19	92:25	76:4	82:4,22	
107:12,23	120:12	teachers	87:7,9,	temporary
108:3	125:11,16	44:21	16,21,23	38:25
110:21	127:15	47:1	88:17,18	tend
112:22	talking	66:11,25	89:13,15	72:16
			94:5 95:5	

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
Index: tenets..times

tenets	things	tier	74:15	86:18
127:9	14:14	24:25	79:22	Tiffany
terms	21:10	25:5,14	82:17	20:9
78:21	24:17	37:4,7,	83:22,23,	time
testified	25:11,14,	13,15,16,	24 84:4,6	5:3 7:18
6:5 40:3	21 32:25	18,23	86:13	18:10
testify	33:5 47:9	38:4,11,	87:1,2,4,	31:14,24
16:15	50:15	20,21,22,	10 88:8	33:20
testifying	54:18	24 39:4,	95:17,22,	36:18
7:5	57:25	6,11,12,	23 96:6	38:12
testimony	62:16	19,21	100:11,	41:23
11:16	66:23	40:1,4,7,	21,23	46:16
12:11,19,	72:24	15,17,19	101:3	47:4
22 15:8,	74:7	41:1,8,	103:13	51:23
12	77:21	12,18,25	112:22	55:18
testing	81:5	42:7,10,	132:15,16	57:12,23
43:25	82:23	12,17,19,	tiered	58:5
45:14	83:7 85:8	23 43:3,	14:14	70:3,21,
77:20,24	87:24	10,12,17,	27:21	24 71:4
TFI	89:3 92:4	19,20	28:10	74:10,14
40:23,24	93:3	45:3,6	38:19	83:6
42:16,18,	94:25	47:22	40:23	86:16
19 51:23	102:16	48:13,20	51:24	93:5,22
52:11	106:19	49:1,7,	52:11,25	99:14
58:20	114:10	10,14,18,	53:4	100:4
81:5,10,	119:23	22,24	58:21	111:11
11,12	120:5	50:9,17,	62:25	timeline
82:1	121:5	18 51:4,	81:6	53:1,4
86:7,8,14	124:8	21 52:4,	83:25	54:10
92:24	126:20	10 54:11,	88:7	55:10
93:14	130:18	15,20,24,	94:18	56:15
96:8	132:6	25 55:3,	108:3	57:4
103:25	thinking	10,13,17,	110:21	timelines
TFIS	17:11	18,24	124:4,13	53:8,24
81:14	65:4 73:8	56:7,16,	tiers	84:24
82:22	thinks	21,24	22:4	times
therapeutic	87:23	57:5	37:17	30:22
10:6	thought	58:15,18,	38:15,18	41:13
18:2,9	65:14	21,24	59:15	46:22,23
thing	66:9	59:12,18,	62:11	81:13
7:23 19:5	86:16	21,23	71:15	84:14
68:23	102:4	60:5,6,	72:15	89:15
three-day	three-day	10,19,20,	74:1 75:8	92:1,25
	103:18	22,23	82:10	94:19
		61:21	83:10,17	
		63:16	85:22	
		71:13		

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
Index: title..turn

121:18	22 87:4	64:6,9	12,15,21,	transition
129:12	tools	73:13	23 80:4,6	75:24
title	81:17	77:3,13	82:10,14,	100:14
12:2	88:4,21	83:13	17 83:15,	transitione
124:17	89:12	86:21	16 84:3,6	d
125:9	top	104:24	85:2 88:9	102:3
126:2	53:14	trained	95:3,6	106:7
131:16,17	126:14	22:3 40:7	102:21	transitioni
132:2,5,	topic	42:23	103:3,15,	ng
13	13:1	83:12	18,24	101:16
titled	topics	132:14,15	104:1,4,8	transmitted
53:3	12:12,22	trainer	105:3,4	96:15
today	15:8,12,	34:25	106:24	transportat
5:11 6:17	21 16:15	trainers	112:23	ion
9:9,13	total	62:13	113:11,	114:3
12:11,19	22:2	training	12,14,18,	travel
15:9,13	92:14	21:17,21	21,22,25	106:15
16:16	110:23	22:1 33:7	114:9	113:6,20,
19:2,22,	113:10	34:18,22	121:14,18	23 114:2,
25 20:18,	touched	36:16	130:17,	8 118:3
22 30:12	29:16	37:17	19,25	trainings
32:7 36:2	track	38:6,8	28:16	trend
58:16	41:17,25	42:1	31:3	92:4
62:6	42:7,22	43:2,7	37:18	trends
80:17	91:21	48:21	49:11	71:17
89:25	115:8	49:8,14,	56:6	72:15
97:19	tracked	18 55:2	59:18	trial
122:13	91:16	56:2,5,	77:7	6:12
124:14	116:8	18,20	103:14,17	triangle
131:23,24	tracking	58:18,25	104:15,21	95:21
132:3	42:4 92:9	59:1,5,6,	113:6,7,	trio
133:2,13	traditional	11,12,16,	19 129:20	102:24
134:5	18:4	20,21	130:18	true
today's	Traditional	60:20,23	transcript	61:9
5:2 21:1	ly	61:2,15,	109:22	107:23
23:2	91:5	21 62:9	transcripts	truth
134:15	train	64:10	20:17	7:3,7
tolerance	31:15	72:22	transformat	truthfully
65:9	34:20,25	74:15	ion	9:13
tolerate	58:23	76:11,12,	62:7	turn
65:14	62:14	21,23	110:11	27:14,15
tool		77:5,16	112:8	
81:20		78:2,11,	113:4,16	
86:16,18,		13,19,22,		
		25 79:7,		

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIAMarch 06, 2023
Index: turnover..Wanda

79:2	unaware	11:15	81:2	visit
turnover	33:21	61:17	112:17	18:24
73:11,12,	116:3	123:9	vacuum	128:24
14 105:2	uncommon	universal	90:5	visits
tweak	105:19	76:2	valid	82:19
102:16	underneath	universally	30:19	voice
tweaked	15:14	81:19	validated	121:3
102:10,11	understand	University	40:24	voices
twisted	7:8,11	16:1	variety	20:13
123:9	8:7,17,	17:5,6	105:20	voluntarily
two-	18,24,25	37:20	vehicle	36:11
103:18	10:1,5,9,	38:5	26:6	92:11
two-day	12,15,18,	40:12	115:23	93:12
78:18	21,24	41:5,20	125:6	94:2,17
two-	11:2,5,8	42:2,23	verify	voluntary
dimensional	38:10	43:3 52:8	128:18	33:13,23
92:3	39:8	56:11	versus	88:25
two-year	100:1	62:24	5:6 101:8	94:5
102:14	124:23	71:21	116:13	
type	126:7,23	73:23	130:20	W
45:5 79:7	understanda	unsafe	Vickie	W-E-I-S-T
91:11	ble	126:20	99:9,21,	112:2
typically	58:11	update	22	wait
37:15	understandi	80:14	Victoria	118:3
48:16	ng	128:7	5:21	walk
84:21	9:24	uploads	video	89:7
94:21	12:10	62:25	90:17	walk-
102:10	18:1	upper	videoconfer	throughs
107:15	97:12,18	62:11	ence	83:20
109:15,23	125:24	109:14,24	5:4	94:24
112:25	Understood	110:6	view	walked
113:9,20	8:6,10	upstream	13:19	19:6
119:11	undertaken	121:23	21:11	54:25
	65:25	130:16	30:24	walking
	unique	urban	Virginia	98:6
U	101:6	73:15	81:8,18	walls
U.S.	unit	utilize	82:1	19:6
5:8	27:20	36:6	virtually	Wanda
ultimately	29:2	V	5:19,24	5:12
33:3	united	vacancies	8:1 78:1	
	5:6,19			
	6:14,15			

JUSTIN HILL 30b6
UNITED STATES vs STATE OF GEORGIA

March 06, 2023
Index: wanted..Zelphine

wanted	weigh	worked	53:11,24,	youth
54:19	90:3	54:22	25 54:12	121:24
55:6 57:1	weighing	106:13	55:12,25	
65:7	66:16	workers	56:17	Z
102:17	Weist	14:12	57:15	
Washington	112:2	15:3	63:10	Zel
32:17	wellbeing	124:5	69:11	70:24
61:14	120:7	working	77:11	Zelphine
107:22	121:7,10	19:2,8	78:14	70:19,20,
ways	wellness	61:20	79:12,13	21
16:12	14:19	120:22	85:6	
28:7	120:8,15	world	91:6,7,15	
29:17	whiteboard	73:18	92:21,23	
30:8,13	123:14	worthy	94:14,21	
34:14	whole-scale	128:21	102:2,9,	
61:1 82:8	16:9	wraparound	11 110:12	
130:13	wholly	15:2	117:6	
web	58:18	129:2,4	133:5	years
21:2	Wisconsin	130:3	13:6	
22:20	32:18	writing	30:25	
95:1	107:21	80:25	31:1,10	
98:23	woefully	wrote	35:2 44:6	
123:11	54:15	71:12	46:13,19	
128:7	Woods	75:6	53:8,13	
webinars	74:23	100:7,19,	56:4	
85:17	Woolridge	21	63:12	
webpage	112:3		65:1	
21:12	word	Y	71:16	
123:12,13	81:12	Y-A-C-O-B-	72:15,23	
website	work	A-C-C-I	73:1	
21:20	26:3	112:6	77:17	
118:12,18	47:10	Yacobacci	85:10	
126:22	67:23	112:5	86:9,24	
websites	92:6,11	year	87:1 93:5	
21:11,15	102:22	10:25	103:19,22	
Wednesday	106:13,21	13:22,25	113:4	
123:12,14	108:6,14	35:24	115:20	
Wednesday's	125:7	36:23	117:9,10	
126:21	129:21	37:10,11	yielding	
128:10	130:24	39:3,5,	44:24	
weeks		19,20	45:7 65:9	
118:3			yields	
			33:15	